

# EXHIBIT D

**In The Matter Of:**  
*Parker vs.*  
*City of Detroit, et al.*

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*Police Officer Jerold Blanding*  
*October 12, 2017*

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*Original File BLANDING\_POLICE OFFICER JEROLD.txt*  
*Min-U-Script® with Word Index*

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1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF MICHIGAN  
3 SOUTHERN DIVISION  
4  
5 DEMAR PARKER,  
6 Plaintiff,  
7 -vs- Case No. 16-cv-13036-GAD-SDD  
8 CITY OF DETROIT, et al., Hon. Gershwin A. Drain  
9 jointly and severally, Mag. Stephanie Dawkins Davis  
10 Defendants.  
11 ~~~~~/  
12 DEPONENT: POLICE OFFICER JEROLD BLANDING  
13 DATE: Thursday, October 12, 2017  
14 TIME: 1:22 p.m.  
15 LOCATION: City of Detroit Law Department  
16 2 Woodward Avenue, Suite 500  
17 Detroit, Michigan  
18  
19 REPORTER: John J. Slatin, RPR, CSR-5180  
20 Certified Shorthand Reporter  
21  
22 (Appearances listed on page 2)  
23  
24  
25

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1 APPEARANCES:  
2  
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10  
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18  
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1 Thursday, October 12, 2017  
2 Detroit, Michigan  
3 1:22 p.m.  
4 \* \* \*  
5 POLICE OFFICER JEROLD BLANDING,  
6 having been first duly sworn, was examined and testified  
7 as follows:  
8 EXAMINATION  
9 BY MS. PRESCOTT:  
10 Q. So, good afternoon, Officer Blanding. My name is Sarah  
11 Prescott. I represent Demar Parker, and today is the  
12 date for -- Noticed for your deposition.  
13 It's being taken under the Federal Rules of Civil  
14 Procedure relative to the federal suit we filed in this  
15 case, and it can be used for all the purposes that the  
16 rules allow.  
17 My job today is to ask you a series of questions,  
18 and when I've done that and you answer, I have to assume  
19 that we were on the same page.  
20 So, if you have any questions about anything I've  
21 said, or "What are we talking about?" or clarifications,  
22 anything that you need clarified whatsoever, will you  
23 let me know?  
24 A. Yes.  
25 Q. Okay. If you need a break, will you let me know?

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1 A. Yes.  
2 Q. Okay. And if you -- at some point you need to talk to  
3 your lawyer, you can certainly let me know that. I just  
4 need to take an answer to each question, so we have like  
5 peanut butter and jelly, the pair, every question and  
6 answer, and then you can take a break and step out.  
7 A. I need to ask you something before we start.  
8 MS. PRESCOTT: Okay.  
9 (Short recess at 1:23 p.m.)  
10 \* \* \*  
11 (Record resumed at 1:24 p.m.)  
12 MS. PRESCOTT: Okay. So, we're back on the record,  
13 and --  
14 A. So, do I --  
15 MR. PADDISON: No.  
16 There was a brief conversation off the record.  
17 There is anticipation that testimony given during  
18 Officer Blanding's Garrity interview will be taken.  
19 Counselors have agreed that that testimony will be part  
20 of a separate sealed record. Just the request has been  
21 made that no additional recording of the testimony but  
22 for the court reporter be taken during this deposition.  
23 MS. PRESCOTT: Okay. And that's fine. And so we  
24 may -- we may do some playing, and we'll just -- just to  
25 clarify your point about the separate sealed record,

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1 we'll just -- it will be subject to the protective order  
2 we have; right?  
3 MR. PADDISON: Right. Right.  
4 MS. PRESCOTT: Okay. All right.  
5 BY MS. PRESCOTT:  
6 Q. Okay. So, we have -- we have a basic understanding  
7 here, but, Officer, how many times have you been deposed  
8 prior to today?  
9 A. What do you mean?  
10 Q. How many times have you sat and given testimony where  
11 you were either in court where you took an oath, or you  
12 sat down in a -- court reporter -- room with a court  
13 reporter and took an oath before today?  
14 A. Several times. I've been on the police department over  
15 23 and a half years.  
16 Q. Okay. So, what was the first one of those?  
17 A. Are you talking about as far as me making an arrest?  
18 Q. No. Times when you've come in and testified under oath.  
19 A. As far as just like this, like the deposition?  
20 Q. Okay. So, let's break it down.  
21 So, let's put aside court where you're in a  
22 courthouse.  
23 A. Okay.  
24 Q. In the middle of a courtroom where, you know, you've got  
25 a judge and maybe a jury.

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1 Putting those aside, have you sat down in a  
2 proceeding like this where it was a court reporter and  
3 yourself, a lawyer asking you questions?  
4 A. As I recall, maybe once -- one other time.  
5 Q. Okay. And what do you remember about it?  
6 A. It was from a prior shooting -- previous. I can't  
7 remember what year. '96 or '97.  
8 Q. And who was being sued?  
9 A. The City.  
10 Q. Anyone else?  
11 A. Not as far as I know.  
12 Q. Like you -- do you know if you were sued?  
13 A. Yeah, well -- was I sued?  
14 Q. Right.  
15 A. I can't remember the outcome of the case, but it was  
16 from an attempted robbery.  
17 Q. Okay. Separate from the outcome, do you know if you  
18 were accused of doing something wrong in the case?  
19 A. No. I wasn't accused of anything wrong, no disciplinary  
20 action or anything.  
21 Q. Okay. Who was the person that was bringing the lawsuit?  
22 A. I think his name was Johnny Crenshaw.  
23 Q. Was he convicted of whatever, the robbery or acts around  
24 a robbery?  
25 A. I have no idea.

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1 Q. Okay. Do you know whether he was charged?  
2 A. I have no idea.  
3 Q. Okay. And in terms of the outcome, with regard to  
4 Crenshaw, you don't recall what happened there?  
5 A. They didn't tell me. They just said I was -- you know,  
6 after I gave my deposition, that I was fine; that he  
7 apparently received some money for some of his injuries,  
8 not all of them.  
9 Q. Okay. And so you are aware that Mr. Crenshaw settled  
10 with the City relative to what happened there?  
11 A. They wouldn't tell me as to how much or whatnot. They  
12 just said the case was over.  
13 Q. Okay. You had shot Mr. Crenshaw?  
14 A. Yes.  
15 Q. And you claimed that he had a gun; right?  
16 A. He tried to rob us.  
17 Q. But you claimed the man had a gun; right?  
18 A. Yes.  
19 Q. And he said that was a lie; right?  
20 A. If that's what he said.  
21 Q. Do you know?  
22 A. I don't know. I've never -- I didn't deal with him at  
23 all except for the shooting. It was a separate issue.  
24 Q. Do you know -- and so you don't know whether you were a  
25 person who was sued as well as the City?

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1 A. As I recall, it was the City.  
2 You have to talk to the attorney. His name was  
3 Jacob Schwarzburg. That's who handled my case.  
4 Q. Did you give permission to settle the case?  
5 A. How could I give permission to settle the case?  
6 Q. If you were sued, you would have to be the one to say,  
7 "I want to go to trial," or "I want to settle."  
8 MR. PADDISON: Counselor, I think it  
9 mischaracterizes the relationship between the police  
10 officers and the Law Department and city council. City  
11 council, in lawsuits against officers in their official  
12 capacity or the City, city council makes the decision  
13 whether or not to settle, not the individual officer.  
14 MS. PRESCOTT: Okay. Well, he can tell me that, if  
15 that's how it rolls.  
16 MR. PADDISON: Well, you were telling him how the  
17 settlement rolls.  
18 MS. PRESCOTT: Well --  
19 MR. PADDISON: I believe your statement was, "You  
20 would have to give permission" --  
21 MS. PRESCOTT: I was --  
22 MR. PADDISON: -- which mischaracterizes the  
23 relationship to the Law Department.  
24 MS. PRESCOTT: I was offering ways that it might be  
25 that he would give permission. If he's named in a

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1 personal capacity, maybe he gives permission. Maybe  
2 that's a way we can find out if he was named. Hence, my  
3 question.  
4 MR. PADDISON: I mean, you can ask him if he knows  
5 if he was sued.  
6 MS. PRESCOTT: Yeah, and I did. And we're trying  
7 to get at it another way now.  
8 MR. PADDISON: Okay.  
9 MS. PRESCOTT: Okay. That's why.  
10 BY MS. PRESCOTT:  
11 Q. Suffice it to say, you don't recall being a part of a  
12 discussion of whether or not to go on with the case, go  
13 to trial, settle it?  
14 A. I don't recall.  
15 I know I went to the deposition, and then nothing  
16 else happened with it.  
17 Q. Okay. So, Crenshaw is shot. There is a lawsuit.  
18 Is there an internal investigation about it?  
19 MR. PADDISON: Form. Foundation. Relevance.  
20 Go ahead and answer if you know.  
21 A. I've never been disciplined for any of that.  
22 BY MS. PRESCOTT:  
23 Q. Okay. My question was different. It was whether there  
24 was an internal investigation.  
25 A. I have no idea.

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1 Q. Nothing that you can recall, sitting here?  
2 A. No.  
3 Q. Okay. And what have you been disciplined for?  
4 MR. PADDISON: Objection. Relevance.  
5 Go ahead and answer.  
6 A. Minor things. I can't recall. I don't -- I have a good  
7 record. I -- probably an ACR entry or whatnot, but  
8 nothing as far as losing days or suspension, nothing.  
9 BY MS. PRESCOTT:  
10 Q. So, an ACR entry is an entry into your record of the  
11 fact of there was a discipline?  
12 A. Yes. And it's supposed to stay in like six months and  
13 then it's supposed to be erased out of your file.  
14 Q. Okay. So, what are the things you've been disciplined  
15 for?  
16 A. I can't recall everything.  
17 At this point, through my 23 and a half years,  
18 probably -- probably twice.  
19 Q. What are those?  
20 A. One was an incident back in '94 for shooting at a bird  
21 in a vacant building. And then the second one was  
22 something -- some paperwork that we had filed not  
23 correct. And I can't remember. It was minor stuff.  
24 Q. So, you used your service weapon while you were on duty  
25 and shot at a bird?

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1 A. Yes.  
2 Q. And what was the -- what did you understand was the  
3 reason for discipline? Like is there a policy violation  
4 there or what?  
5 A. I can't recall. That happened when I first got on the  
6 job, ma'am.  
7 Q. Has anyone ever mentioned or raised that to you since  
8 1994?  
9 A. They was -- the boss was mad because that wasn't -- that  
10 was supposed to have been erased out of my file, so that  
11 shouldn't even have been brought up.  
12 Q. I didn't understand the first part.  
13 Did someone --  
14 A. It was supposed to have been erased out of my file after  
15 six months.  
16 Q. Okay.  
17 A. That happened way back in '94. I was brand new on the  
18 job.  
19 Q. Okay. But has anyone ever mentioned it or discussed  
20 that incident with you ever since 1994?  
21 A. Just the stuff that you guys put in the paper.  
22 Q. But like -- it's a good clarification.  
23 Has any boss of yours, any supervisor above you,  
24 ever mentioned it?  
25 A. No.

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1 Q. Has anyone ever asked you about what happened there or  
2 the circumstances ever since 1994?  
3 A. No.  
4 Those bosses retired, ma'am.  
5 Q. Okay. But like -- I mean, do you even have any idea  
6 that your current bosses would know about that?  
7 A. I've never looked at my record. If it's still in there,  
8 it shouldn't be. They would know. They would have  
9 access to that.  
10 Q. Okay. It's not in your record, I don't think. So,  
11 that's why I am trying to figure out if your bosses know  
12 about it.  
13 A. Your guess is as good as mine, ma'am.  
14 Q. Okay. You don't know?  
15 A. No.  
16 Q. And then this paperwork thing is what? What was the  
17 allegation against you?  
18 MR. PADDISON: Okay. So, I don't want to jam you  
19 up. I'll just put an ongoing to the line of questioning  
20 regarding allegations of past misconduct. That way I'm  
21 not jamming you up.  
22 MS. PRESCOTT: Yeah.  
23 MR. PADDISON: Go ahead and answer.  
24 A. Something -- not checking something off on a run sheet  
25 that we had to start doing.

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1 BY MS. PRESCOTT:  
2 Q. What year was this?  
3 A. I have -- it happened after 2010.  
4 Q. Let me circle back.  
5 With regard to the 1994 incident with the shooting,  
6 what was the rule or the policy or the -- whatever that  
7 was at issue?  
8 Did you say you didn't know?  
9 A. No. I believe it was just discharging my firearm.  
10 Q. Okay. But why? I mean, why -- what was wrong with  
11 that?  
12 A. I don't recall, ma'am.  
13 Q. Okay. And do you recall -- you don't recall what was  
14 wrong with the run sheet or what the --  
15 A. It was something about -- we -- they changed some  
16 policy. They wanted us doing a run sheet, and my  
17 partner and I were -- kept forgetting to do it because  
18 it was something new, something very tedious, and one of  
19 the sergeants just got mad and said -- they gave us a  
20 verbal counseling and, by me being a senior officer, an  
21 ACR entry.  
22 Q. And do you recall what the -- like what it was that they  
23 were --  
24 A. Not checking in one of the boxes on top of the run sheet  
25 because he got tired of having to check it every day. I

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1 can't recall what it was.  
2 Q. Okay. And so are those the only two times you've ever  
3 been disciplined?  
4 A. As far as -- I had had verbal counseling or something  
5 before.  
6 Q. Okay. How about any kind of discipline?  
7 A. No. I've never been suspended, never lost any days,  
8 nothing, ma'am.  
9 Q. You weren't disciplined with anything regarding to Demar  
10 Parker or shooting him?  
11 A. No.  
12 Q. Okay. So, the first time that you -- we started walking  
13 down this road because of time -- I asked you about  
14 times you had come in and had to sit and testify like  
15 this, and you said the one had to do with Crenshaw.  
16 Are there other times where you've come in and  
17 given questions, with a court reporter, like this?  
18 A. As I recall, we had an incident when I was at Narcotics,  
19 but our whole raid crew had to go down with that one to  
20 trial at the City-County Building, but they were found  
21 not guilty. But I can't remember if we did this  
22 individually like this.  
23 Q. Okay. And what year are we in here that that happens?  
24 A. Either '95, '96 or '97. I was at Narcotics then. Maybe  
25 even '98. It was a fight that the raid crew had.

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1 Q. And so this is -- this fight or this thing with the  
2 narcotics crew, this is the same thing? There's one  
3 incident?  
4 A. I can't recall, like I said, if we did this  
5 individually.  
6 Q. Right.  
7 A. I know that we did have to come to City-County Building,  
8 went to trial for about three days, four days, and we  
9 were all found not guilty.  
10 Q. You all were?  
11 A. Yes.  
12 Q. Okay. And was there a lawyer that you worked with on  
13 that?  
14 A. I can't recall who it was.  
15 Q. And do you recall who was making a claim that something  
16 wrong had been done? Like was there a person like  
17 Johnny Crenshaw?  
18 A. It was like two guys that were in the house during the  
19 raid.  
20 Q. They had alleged that they -- that that officers used  
21 excessive force, undue force?  
22 A. Yes. Something to that extent.  
23 Q. Okay.  
24 THE REPORTER: I'm sorry?  
25 A. I said something to that extent. I can't recall exactly

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1 what --  
2 **THE REPORTER:** Thank you.  
3 **BY MS. PRESCOTT:**  
4 Q. Okay.  
5 A. **And they were charged, too.**  
6 Q. And what names -- you don't remember their names?  
7 A. **No.**  
8 Q. And do you remember some of the other folks who went  
9 down to the City-County Building and were part of that  
10 trial, like other officers?  
11 A. **The raid crew I was on then -- you mean their names?**  
12 Q. Yeah. Like other police officers.  
13 A. **At the time, it was Sergeant Patrick O'Rourke(sic);**  
14 **Officer Dennis Griffiths, he's deceased now; Officer**  
15 **Darren Bell; Officer John Dembinski; myself; I believe**  
16 **Officer Daniel Mitchell. I can't recall if he was on**  
17 **our raid crew that day.**  
18 **That was the crew that I worked on for years.**  
19 Q. Okay. And was there ever a time you ever had to go down  
20 to the federal courthouse on Lafayette for a trial or a  
21 case?  
22 A. **A shooting happened in 2004.**  
23 **I've been to federal court a couple times on drug**  
24 **cases.**  
25 Q. Okay. And what was the 2004 matter?

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1 A. **I shot a guy in the raid.**  
2 Q. And he claimed that that was wrongful, excessive?  
3 A. **No. He was trying to beat the dope case. He was a**  
4 **habitual offender. He had a gun. He went to fire at**  
5 **me, and I fired first.**  
6 Q. So, was there a lawsuit by him?  
7 A. **No. That was a federal court case.**  
8 Q. I just asked because sometimes federal court cases can  
9 be claiming, like this one, excessive force.  
10 A. **No, none of that.**  
11 Q. Okay. Do you remember his name?  
12 A. **They said he's dead now.**  
13 **I believe it was Edward Robinson, Junior.**  
14 Q. So, were you testifying in his criminal conviction or in  
15 his criminal case?  
16 A. **Yes. He got found guilty, life in prison with no**  
17 **parole.**  
18 Q. Okay. And then other times you -- have there been other  
19 times that you've been down at that Lafayette Building?  
20 A. **Yes, for narcotic cases.**  
21 Q. Okay. Have there been other times where you were down  
22 there relative to someone saying that you had done  
23 something wrong?  
24 A. **No. Just narcotics cases.**  
25 Q. How many times have there been citizen complaints

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1 against you?  
2 **MR. PADDISON:** I'm just going to renew the  
3 objection as ongoing.  
4 Go ahead and answer.  
5 A. **I have no idea, ma'am.**  
6 **BY MS. PRESCOTT:**  
7 Q. Do you get notified of them?  
8 A. **Yes, we would get notified, but the majority of them**  
9 **came when we were at Narcotics, and they would be**  
10 **against the whole raid crew.**  
11 Q. So, how many have said that you used excessive force?  
12 A. **I can't recall. There were just accusations of**  
13 **different things of not having a search warrant, just**  
14 **trying to beat the narcotics case.**  
15 Q. Okay. And so you're not sure about the number that  
16 involved a claim of excessive force?  
17 A. **Me personally, no.**  
18 Q. And how many of them were resolved where there was a  
19 specific finding one way or another way as opposed to  
20 unfounded or unsubstantiated or just no resolution at  
21 all?  
22 A. **The majority of them were unfounded, no resolution.**  
23 **And, like I said, I have a good record.**  
24 Q. Well, when you say "majority," then I have to probe it,  
25 because "majority" to me means more than half.

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1 So, I want to make sure we get on the same page.  
2 Do you know how many have come out with specific  
3 findings one way or another?  
4 A. **No.**  
5 Q. Is that something that you can go back, if you wanted --  
6 like back at your precinct or whatever and you can go  
7 back and look up?  
8 A. **No. When I was at Narcotics, the majority of the stuff**  
9 **was on paperwork, so I don't know where you would find**  
10 **that stuff at in Narcotics.**  
11 Q. Do you know how many times you've been named as a person  
12 who is sued in a lawsuit?  
13 A. **Just -- as I recall, just this and with Johnny Crenshaw.**  
14 **And the incident I told you about where the whole**  
15 **raid crew went; that they were trying to sue the whole**  
16 **raid crew.**  
17 Q. And with regard to the Crenshaw, did you -- did you get  
18 put out on a leave while there was an investigation --  
19 if -- at any point, did you get put out on a leave  
20 relative to that shooting?  
21 A. **No.**  
22 Q. Has anyone discussed that shooting with you since this  
23 case came -- the events of this case?  
24 **MR. PADDISON:** I'll just clarify. I'm going to  
25 instruct my client not to answer to the extent it was --

<p style="text-align: right;">Page 21</p> <p>1 involves conversations between himself and his attorney</p> <p>2 in this case or himself and his DPOA attorney.</p> <p>3 Beyond those objections, you can go ahead and</p> <p>4 answer.</p> <p>5 <b>A. What was your question again?</b></p> <p>6 <b>MR. PADDISON:</b> Sorry.</p> <p>7 <b>MS. PRESCOTT:</b> That's all right.</p> <p>8 <b>BY MS. PRESCOTT:</b></p> <p>9 Q. Has anyone at Detroit Police Department raised or</p> <p>10 discussed the Crenshaw matter with you since the events</p> <p>11 of this case?</p> <p>12 <b>A. No.</b></p> <p>13 Q. Like there were no questions about that when you were</p> <p>14 questioned about Demar Parker?</p> <p>15 <b>A. No.</b></p> <p>16 Q. Did you have your badge or gun taken at any point</p> <p>17 relative to the Crenshaw thing?</p> <p>18 <b>A. No. I've never had my -- wait a minute. Let me think.</b></p> <p>19 <b>THE REPORTER:</b> Excuse me?</p> <p>20 <b>A. I said let me think.</b></p> <p>21 <b>When -- the Crenshaw thing, I had to go to the lab</b></p> <p>22 <b>the next day for them to fire it, but I never had my gun</b></p> <p>23 <b>taken.</b></p> <p>24 <b>With this incident, they took my gun and gave me</b></p> <p>25 <b>a -- I'm trying to think.</b></p>	<p style="text-align: right;">Page 23</p> <p>1 <b>trial.</b></p> <p>2 Q. My question is whether or not anyone ever sought</p> <p>3 criminal charges against you for whatever you -- what</p> <p>4 your role was.</p> <p>5 <b>A. It was the whole raid crew, ma'am. That's what I keep</b></p> <p>6 <b>trying to explain to you.</b></p> <p>7 Q. Okay. So, do you think the whole raid crew had criminal</p> <p>8 charges taken against them as opposed to a guy saying,</p> <p>9 "You did something wrong to me"? Did the --</p> <p>10 <b>A. I was part of the raid crew.</b></p> <p>11 Q. -- prosecutor? You're not sure?</p> <p>12 <b>A. It's confusing. I was part of the raid.</b></p> <p>13 <b>MR. PADDISON:</b> Can I -- because I think you and I</p> <p>14 understand what you're asking. Do you mind if I try and</p> <p>15 clarify?</p> <p>16 <b>MS. PRESCOTT:</b> Yeah.</p> <p>17 <b>MR. PADDISON:</b> And if I'm not getting it for you --</p> <p>18 Has there ever been a situation where you were</p> <p>19 involved in a lawsuit or a criminal prosecution where</p> <p>20 there was a possibility that you could go to jail or</p> <p>21 that you could be convicted of a crime?</p> <p>22 <b>A. No.</b></p> <p>23 <b>MR. PADDISON:</b> Okay. Are you aware of any</p> <p>24 circumstance where you could be found liable to pay</p> <p>25 money, or the City pay money on your behalf?</p>
<p style="text-align: right;">Page 22</p> <p>1 <b>Did they give me a loaner?</b></p> <p>2 <b>Yeah. They gave me a loaner on this incident.</b></p> <p>3 <b>BY MS. PRESCOTT:</b></p> <p>4 Q. Relative to Demar Parker?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Okay. Other than the time that you just described where</p> <p>7 they took your gun and gave you a loaner in the Demar</p> <p>8 Parker matter, have you ever had your gun taken?</p> <p>9 <b>A. Taken as far as what, ma'am? That's two different</b></p> <p>10 <b>things.</b></p> <p>11 <b>Like suspended?</b></p> <p>12 Q. Yeah, like "Give me your badge and your gun."</p> <p>13 <b>A. No, never.</b></p> <p>14 Q. Okay. And were there ever any charges sought against</p> <p>15 you with regard to the Crenshaw matter?</p> <p>16 <b>A. No.</b></p> <p>17 Q. Have you ever had criminal charges sought against you?</p> <p>18 <b>A. Just the incident, as I recall, with the raid crew.</b></p> <p>19 Q. Criminal charges?</p> <p>20 <b>A. I can't remember exactly, ma'am. It was a horrible</b></p> <p>21 <b>fight in the house, a bunch of dogs, a bunch of</b></p> <p>22 <b>commotion.</b></p> <p>23 Q. Okay.</p> <p>24 <b>A. And they got found guilty of the drugs, and all the</b></p> <p>25 <b>allegations against us were dismissed during the jury</b></p>	<p style="text-align: right;">Page 24</p> <p>1 <b>A. No.</b></p> <p>2 <b>MS. PRESCOTT:</b> Okay.</p> <p>3 <b>MR. PADDISON:</b> I hope I --</p> <p>4 <b>BY MS. PRESCOTT:</b></p> <p>5 Q. Has anyone every sought a warrant on you?</p> <p>6 <b>A. Do you mean -- well, per Homicide, if there's a</b></p> <p>7 <b>shooting, they have to do a warrant, but they were</b></p> <p>8 <b>denied.</b></p> <p>9 Q. When did Homicide have to do warrants for you?</p> <p>10 <b>A. As far as I know, they have to do them for every</b></p> <p>11 <b>shooting.</b></p> <p>12 Q. Do you know whether that was in place back when the</p> <p>13 Crenshaw thing happened?</p> <p>14 <b>A. I'm sure they did, but as far as them arresting me or</b></p> <p>15 <b>anything, no.</b></p> <p>16 Q. No, no. Yeah, I guess I want to distinguish what you</p> <p>17 know and what you think probably was true.</p> <p>18 So, do you know when the policy was of we're just</p> <p>19 going to go get -- look for a warrant after any</p> <p>20 shooting?</p> <p>21 <b>A. As far as I know, each time you fire your weapon,</b></p> <p>22 <b>Internal Affairs and Force Investigation and Homicide</b></p> <p>23 <b>will have to sought a warrant against the officer, and</b></p> <p>24 <b>so far they have all been denied, and one is still open.</b></p> <p>25 Q. Okay. And so the seeking of the warrant, that's been</p>

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1 true your whole career, it sounds like, then, is what  
2 you're telling me, or at least since the Crenshaw thing  
3 happened?  
4 **A. Yes.**  
5 Q. Okay. And so as far as you would know, they would seek  
6 a warrant relative to Crenshaw, the guy in the raid in  
7 the house with a bunch of you in Narcotics, Demar  
8 Parker, and then you said there's one still outstanding?  
9 **A. Yes.**  
10 **It was another shooting prior to that, but that --**  
11 **all of them were denied. And the one that's still**  
12 **outstanding now, it's still an ongoing investigation.**  
13 Q. And so what is another shooting prior that I missed?  
14 Which one did I miss?  
15 **MR. PADDISON:** Okay. Just to clarify, I'm going to  
16 place an ongoing objection as to allegations of past  
17 misconduct or past shootings with -- I'll now place an  
18 ongoing as to any allegations of misconduct or shootings  
19 that occurred after the Demar Parker incident. Counsel,  
20 I don't want to jam you up.  
21 So, go ahead and answer.  
22 **MS. PRESCOTT:** Okay. So, that -- just -- that's a  
23 fine objection, but --  
24 **BY MS. PRESCOTT:**  
25 Q. So, you had mentioned -- so, I ticked off -- okay -- so,

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1 Crenshaw, the one with the raid with Narcotics, Parker,  
2 and then one outstanding. You said, well, there's  
3 another shooting prior.  
4 Have I missed a shooting?  
5 **A. Oh. There's a guy named Charles Trask.**  
6 **THE REPORTER:** The name? I'm sorry.  
7 **A. I believe his last name was Trask. Charles Trask.**  
8 **BY MS. PRESCOTT:**  
9 Q. And was there a lawsuit around that or not a lawsuit?  
10 **A. No.**  
11 Q. And was he killed?  
12 **A. No.**  
13 Q. Okay. But -- and you were the officer involved in the  
14 shooting?  
15 **A. Yes.**  
16 Q. Okay. And what year?  
17 **A. I don't recall. '97, '98.**  
18 Q. And what was he doing that caused you to shoot him?  
19 **A. That case, I have no idea, ma'am. He pulled up next to**  
20 **me and my buddy and started shooting at us. I didn't**  
21 **have any words with anyone, never saw the guy in my**  
22 **life. He -- per the investigators, they think that he**  
23 **thought I was someone else.**  
24 Q. Okay. So, did he -- did he shoot the person you were  
25 with or you?

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1 **A. I shot him.**  
2 Q. Okay. So, you said, "He pulled up and started shooting  
3 at us."  
4 **A. Just started -- just pulled up and started shooting.**  
5 Q. Okay. So, did he shoot anybody? Did he shoot anybody?  
6 **A. Oh. No one got shot, not me or my buddy that I was**  
7 **with.**  
8 Q. Okay. And who were you with?  
9 **A. He's retired now.**  
10 Q. So, it was an officer?  
11 **A. Yes.**  
12 Q. Were you on duty?  
13 **A. No.**  
14 Q. Okay. What was the officer's name?  
15 **A. Heshimu Greene.**  
16 Q. Okay. And was there damage to a car?  
17 **A. My car was -- my dad's vehicle was shot all up.**  
18 Q. Okay. So, what -- were you like at a stoplight or  
19 something?  
20 **A. No. I was turning around in an alley to go pick up**  
21 **someone else, down a side street, and he came driving**  
22 **down the alley, and then just started unloading on us.**  
23 Q. Okay.  
24 **A. No words exchanged, nothing. I don't know the guy,**  
25 **never saw the guy before or anything.**

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1 Q. Okay. And so it was just a random thing?  
2 **A. Per the investigators, they said he must have thought we**  
3 **were someone else.**  
4 Q. Okay. And you didn't have to give up your badge or your  
5 gun for that?  
6 **A. No.**  
7 Q. And you didn't have any suspension for -- during an  
8 investigation?  
9 **A. No.**  
10 Q. And do you know whether this is marked in any of your  
11 files anywhere?  
12 **A. Probably in the archives.**  
13 Q. Not sure?  
14 **A. I said this is back when we were doing paperwork, ma'am,**  
15 **when we were literally typing paperwork.**  
16 Q. Okay. But -- so, did you have to make a report about  
17 it?  
18 **A. Yes.**  
19 Q. And was there an Internal Affairs investigation?  
20 **A. Not that I know. He was caught days later.**  
21 Q. Was there any kind of investigation into your conduct at  
22 all?  
23 **A. No.**  
24 **We went to trial on that.**  
25 Q. Okay. And the other open warrant is about what?

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1 MR. PADDISON: You can go ahead. I already placed  
2 my objection. You can go ahead and answer.  
3 A. Oh, a fatal shooting I had February 13th.  
4 BY MS. PRESCOTT:  
5 Q. 2016 or '17?  
6 A. This year.  
7 Q. And that was a kid -- kids in a car joyriding or  
8 something?  
9 A. Well --  
10 Q. They had stolen a car? What was going on?  
11 A. It was are you a suspect.  
12 Q. Oh, can you say that -- what that means, please?  
13 A. He had carjacked someone.  
14 Q. Okay. And there was a group of people in the car?  
15 A. Just him.  
16 Q. Oh, there was just him.  
17 Okay. So, you're on duty?  
18 A. Yes.  
19 Q. And so they tell you -- go get this guy with  
20 such-and-such description of the car?  
21 A. No. We were just doing routine investigation. The car  
22 started going at a high rate of speed. We couldn't  
23 catch up to it to give out the plate. He ended up  
24 crashing into a building and took off running. We gave  
25 chase.

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1 MR. PADDISON: I'm going to pause you right here.  
2 Have you given a Garrity statement about this  
3 issue?  
4 Counsel, the only reason I ask is, during Garrity  
5 they are instructed not to discuss --  
6 A. Oh. You know what? You're right. I'm not sure because  
7 I've been off.  
8 MR. PADDISON: Because they are instructed not to  
9 discuss the matters of that investigation until it is  
10 concluded.  
11 Do you know if you've given a Garrity statement  
12 relevant to that?  
13 A. I've just been going to therapy.  
14 MR. PADDISON: Okay. Have you had a situation  
15 where you had a DPOA attorney there with you and you  
16 were asked questions by a use of force investigator?  
17 A. I can't recall.  
18 MR. PADDISON: Okay. Counselor, unless you object,  
19 could we put this portion of the testimony under a  
20 separate seal, just pending whether I get information  
21 that there's been a Garrity statement? I don't want to  
22 put him in --  
23 MS. PRESCOTT: We can take the rest of the answer  
24 on the same -- subject to the same protective order  
25 issue.

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1 A. I thought you were telling me not to talk about it  
2 except --  
3 MR. PADDISON: No -- right. That why we're putting  
4 it on a protective order.  
5 So, if it comes out that Garrity -- that you have  
6 done a Garrity statement in that, this portion of the  
7 transcript will be protected under a protective order;  
8 okay?  
9 Do you know if you've met with an attorney? I  
10 mean --  
11 A. I've been off work since.  
12 MR. PADDISON: I -- I'm trying to --  
13 MS. PRESCOTT: It doesn't matter. I mean, you're  
14 being -- I mean, this is a compelled, you know,  
15 statement, so --  
16 MR. PADDISON: No, I understand.  
17 MS. PRESCOTT: It's not like you're choosing to  
18 come gossip about it or something to someone.  
19 MR. PADDISON: No, I understand that. But also, I  
20 mean, he could be facing criminal charges for speaking  
21 about it, so -- if he's got a sealed Garrity order not  
22 to discuss it until the conclusion of the investigation.  
23 MS. PRESCOTT: That doesn't bind me, though. I  
24 mean, whatever the department wants to say to its people  
25 doesn't stop me in a --

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1 MR. PADDISON: Okay. Then -- I mean, what we'll do  
2 then -- and -- so, Officer Blanding, until we figure out  
3 whether or not there has been -- whether or not you've  
4 taken a Garrity statement relevant to this incident,  
5 I'll instruct you not to answer.  
6 I will stipulate with counsel that if you haven't  
7 taken a Garrity, we will produce you for a deposition  
8 limited to those issues.  
9 MS. PRESCOTT: Okay. But that will be the third  
10 time that I have had to come down here.  
11 MR. PADDISON: Okay. Then the alternative,  
12 Counsel, is that I just advise him of his Fifth  
13 Amendment rights and tell him not to answer, and we get  
14 nowhere with that.  
15 MS. PRESCOTT: Yeah. Okay. Well, so I'll take  
16 that.  
17 I mean --  
18 MR. PADDISON: Okay.  
19 MS. PRESCOTT: So, if that's the better -- if  
20 that's what --  
21 MR. PADDISON: I'm stipulating to saying let's --  
22 with respect to this issue, we can press pause, and I'm  
23 happy to reproduce him if we find there is no Garrity  
24 order.  
25 MS. PRESCOTT: Why don't we -- why don't we -- I

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1 don't agree to press pause, but if you want to maybe  
2 look at it while we are on a break or something or find  
3 out or whatever, we can come back to it.  
4 **MR. PADDISON:** Okay. That's fine.  
5 **MS. PRESCOTT:** Let's put it that way.  
6 **MR. PADDISON:** I'll get ahold of the DPOA rep and  
7 figure out if there's been a Garrity statement. If  
8 there hasn't, he can talk about it.  
9 So, we'll move on. Next time -- next time we take  
10 a break, I'll talk to the DPOA and we'll figure out  
11 what's going on with that.  
12 **BY MS. PRESCOTT:**  
13 Q. Okay. Relative to that situation, it sounds like you've  
14 been off work I just heard you saying; is that right?  
15 **A. Administrative leave.**  
16 Q. Since when?  
17 **A. February 13th.**  
18 Q. And what is administrative -- like how does that get  
19 initiated? Who says you're going to be on the  
20 administrative leave?  
21 **A. Between the union and my commander, I guess, and medical**  
22 **section.**  
23 Q. Okay. So, you put in for a request medically to be off?  
24 **A. I didn't put in for it.**  
25 Q. Did someone tell you, "You can't come back to work until

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1 we say so," or is it --  
2 **A. It's still under investigation. They still have me**  
3 **going to therapy once a week and going to another**  
4 **doctor, then going to the medical section.**  
5 **That's out of my control.**  
6 Q. Okay. So, the department has put you out while you're  
7 going through that therapy?  
8 **A. Yes.**  
9 **Not out like you think. I mean, just on**  
10 **administrative leave.**  
11 Q. Well, would you be working if you -- I mean, are you  
12 able to go back and say, "I'm ready to come back now"?  
13 **A. No. I don't want to go back right now.**  
14 Q. But my question is, could you?  
15 If you woke up tomorrow and said, "I feel like  
16 going to work," can you do that?  
17 **A. I'm not sure.**  
18 Q. Okay. Do you know whether you have to take a  
19 fitness-for-duty exam at any point?  
20 **A. Have I taken one?**  
21 Q. Well, let's start there.  
22 Have you ever been asked to take a fitness-for-duty  
23 exam by a doctor?  
24 **A. No. I just answer these questions when I go to therapy.**  
25 Q. Okay. And do you know whether -- what you'd have to do

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1 to get re-placed on the active roles, active duty?  
2 **A. That, I'm not sure.**  
3 Q. And are you on any medications today?  
4 **A. Yes.**  
5 Q. What?  
6 **MR. PADDISON:** Counsel, this is off record.  
7 **MS. PRESCOTT:** Okay.  
8 **MR. PADDISON:** Medical information. But he can  
9 answer off the record.  
10 **THE REPORTER:** So, I'm sorry --  
11 **MS. PRESCOTT:** Oh. Well, no. Oh, I thought you  
12 just wanted to talk to me.  
13 **MR. PADDISON:** No. I'm saying that -- I mean, his  
14 private medical information -- I mean, I understand  
15 your -- why you're requesting it, but it doesn't need to  
16 necessarily be part of a public transcript.  
17 **MS. PRESCOTT:** Okay. Do you want to put it on the  
18 other record?  
19 **MR. PADDISON:** That's fine. We can do that.  
20 **MS. PRESCOTT:** Okay. So, we'll go on the record  
21 subject to the protective order.  
22 (Testimony from pages 36 and 37 excerpted  
23 and bound under separate cover.)  
24 \*  
25 \*

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1 (Non-excerpted testimony resumes.)  
2 **BY MS. PRESCOTT:**  
3 Q. How many times did you answer questions about Demar  
4 Parker, in the matter of Demar Parker, to your bosses or  
5 internal investigators at DPD?  
6 **A. I went down with -- for Garrity, you mean?**  
7 Q. Could be Garrity, could be something less formal.  
8 **A. I went down there for that, for the Garrity, and then**  
9 **I did a report when he cut me off at the kids' school.**  
10 **And that was about it.**  
11 Q. Okay. So, what I'm asking about is times where somebody  
12 at DPD sat down asked you questions about Demar Parker  
13 like I'm doing here today. Like, you know, just asked  
14 you questions, person to person, verbally.  
15 Was it just the one Garrity?  
16 **A. I went to the union --**  
17 **MR. PADDISON:** I'm going to advise you not to  
18 discuss what was said between you and an attorney, but  
19 you can discuss that you spoke to somebody.  
20 **A. Whatever day that was I went to the union.**  
21 **I can't remember when you talked to --**  
22 **MR. PADDISON:** Counselor, I believe that was the  
23 day that he actually showed up and Marcus Ways's  
24 deposition was scheduled.  
25 I don't know the date off the top of my head.

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1 MS. PRESCOTT: Okay.  
2 MR. PADDISON: But you spoke with a DPOA attorney  
3 at that time?  
4 A. Yes.  
5 MR. PADDISON: Okay.  
6 BY MS. PRESCOTT:  
7 Q. Okay. When we were supposed to be here last time giving  
8 questions and answers, what happened that day?  
9 A. I forgot why I had to go to the union that day, but --  
10 Q. So, I'm on a different day. I'm on a couple weeks ago  
11 when we were scheduled to be here and then you didn't  
12 come.  
13 Why? What happened that day?  
14 A. What do you mean I didn't come?  
15 Q. You were not here for your deposition.  
16 MR. PADDISON: I think it was last -- was it last  
17 week?  
18 A. I didn't know anything about it.  
19 I barely go in to the station. My supervisor  
20 called me and said that they will notify me.  
21 BY MS. PRESCOTT:  
22 Q. Okay. So, you didn't know until recently that you were  
23 scheduled for this deposition? This is the first time  
24 you think you've been scheduled?  
25 A. I thought I would hear it from the City, and that's when

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1 I got a phone call and said okay.  
2 Q. Okay. Relative to a report about cutting off at a kid's  
3 school, what are you talking about?  
4 A. I saw Mr. Parker -- well, I didn't know it was him at  
5 first.  
6 I was leaving the kids' school and found out later  
7 that his daughter and my kids were attending the same  
8 school. Leaving out of the parking lot, he cut me off,  
9 was looking at me real hard. I didn't know who he was  
10 or if he was rushing to leave or go to work or whatever.  
11 The crossings guard were telling him to go ahead. He  
12 kept looking at me real hard, staying in front of me,  
13 blocking traffic, saying something through his window,  
14 but his window was up, and I was still looking, like  
15 signaling for him to go ahead. I didn't know who he  
16 was. Then as soon as he pulled off, it snapped and I  
17 said that was Demar Parker, and I did a report.  
18 Q. Okay. So, he got in your way in the school parking lot?  
19 A. Well, cut me off, like an intimidation.  
20 Q. Okay. So, he was driving and you were driving?  
21 A. Yes.  
22 Q. Okay. And he was in front of you to be cutting you off;  
23 is that right?  
24 A. I was in front of him at first.  
25 Q. Okay.

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1 A. And then he drove up on the side of me, real close, and  
2 then cut me off.  
3 Q. Okay. And --  
4 A. The union has a report on that, and I can't remember  
5 what detective was handling it.  
6 Q. And was there a police report?  
7 A. Yes, I did a police report.  
8 Q. Okay. And so what was the -- why did you do a police  
9 report?  
10 A. For the intimidation and because I didn't know what else  
11 he had in mind and to protect my kids just as well as  
12 his.  
13 Q. Okay. So, you -- the intimidation is the looking at  
14 you?  
15 A. The cutting me off the way that he was driving.  
16 Q. Yeah, but, I mean, you must have been cut off in traffic  
17 a hundred times. We all have. That's my point.  
18 A. Ma'am, this is a small school. The way that he cut me  
19 off in the parking lot, he knew exactly what he was  
20 doing.  
21 Q. Okay. So --  
22 A. Even the crossing guards were telling him to move on, to  
23 move on, to move on, and I just thought he was someone  
24 late, going to work. As soon as he pulled off, it  
25 clicked to me who he was.

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1 Q. Okay. So, at the time, you think it was just some guy,  
2 and you're like, "What the heck? Get out of my -- go,"  
3 whatever?  
4 A. That's what I said.  
5 Q. Okay. And then that was it?  
6 A. And then I --  
7 Q. I mean, there's nothing else that day?  
8 I know you made a report, but like have we covered  
9 everything that happened in the school parking lot?  
10 A. Yeah. I mean, I figured out who he was and who -- that  
11 our kids went to the same school, so that's why I did  
12 the report as well.  
13 Q. Yeah. I'm just asking, have we covered everything that  
14 happened in the parking lot?  
15 A. As far as I know, yes.  
16 Q. Okay. And there's never been any other time in the  
17 parking lot or at the school grounds or the park or any  
18 time you've ever seen him since?  
19 A. No, I see him every now and then.  
20 Q. Oh, you have?  
21 A. Yes.  
22 Q. Whereabouts?  
23 A. At the school.  
24 Q. Oh, seen at school.  
25 Okay. And then what happened? Anything happening

<p style="text-align: right;">Page 43</p> <p>1 at those times?</p> <p>2 <b>A. Nothing.</b></p> <p>3 Q. Okay. Have you ever seen him any other place before</p> <p>4 that time at the school with the cutting off, between</p> <p>5 the night that you shot him and the night in the</p> <p>6 school -- or the day at the school?</p> <p>7 <b>A. I didn't know him from Adam.</b></p> <p>8 Q. But did you see him in between at all?</p> <p>9 <b>A. No.</b></p> <p>10 Q. Okay. And you'd never seen him before the night of the</p> <p>11 shooting?</p> <p>12 <b>A. No.</b></p> <p>13 Q. Did you work the day -- earlier in that day of the night</p> <p>14 of the shooting?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. In the 10th or the 12th Precinct? 10th?</p> <p>17 <b>A. 10th.</b></p> <p>18 Q. Who was the -- did you have a partner when you were</p> <p>19 driving with this thing in February of 2017?</p> <p>20 You said, "We were doing a routine investigation."</p> <p>21 Did you have a partner you were with that day?</p> <p>22 <b>A. As far as the fatal shooting?</b></p> <p>23 Q. Yeah.</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. Who?</p>	<p style="text-align: right;">Page 45</p> <p>1 Q. And you had a relationship outside of work with both of</p> <p>2 them; right? You had seen them outside of work?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. And then you would also like visit with each other's</p> <p>5 families?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Okay. And so there were -- and I've gotten to talk to</p> <p>8 both of them first, so I know -- some of this we'll just</p> <p>9 run through a little bit quicker, but it sounds like at</p> <p>10 some time there was almost like a three-person car or a</p> <p>11 three-person partnership between Townson and Ways and</p> <p>12 you; is that right?</p> <p>13 <b>A. Three or four.</b></p> <p>14 Q. Okay. And who was -- when you would have a fourth, who</p> <p>15 would that be?</p> <p>16 <b>A. They would switch up whoever is the extra we working --</b></p> <p>17 Q. Okay. And in 2010, when you arrived, was your boss the</p> <p>18 same as the night of the shooting, like your direct</p> <p>19 chain of command, sergeant or whoever it would have</p> <p>20 been?</p> <p>21 <b>A. From which time, ma'am.</b></p> <p>22 Q. So, from 2010 to 2015, you have the same boss, or does</p> <p>23 it change up?</p> <p>24 <b>A. Oh, it changed up.</b></p> <p>25 Q. Okay. So, then, as of August of 2015, who is your boss,</p>
<p style="text-align: right;">Page 44</p> <p>1 <b>A. Mike Davis.</b></p> <p>2 Q. Anyone else?</p> <p>3 <b>A. Other people made the location later.</b></p> <p>4 Q. How about Mr. Ways or Mr. Townson?</p> <p>5 <b>A. No. They -- Townson has been off, and Ways is working</b></p> <p>6 <b>in another unit.</b></p> <p>7 Q. Okay. So --</p> <p>8 <b>THE REPORTER:</b> I'm sorry?</p> <p>9 <b>A. Townson has been off work, and Ways is working in</b></p> <p>10 <b>another unit.</b></p> <p>11 <b>THE REPORTER:</b> Thank you.</p> <p>12 <b>BY MS. PRESCOTT:</b></p> <p>13 Q. Okay. And so had you been -- you had been partners with</p> <p>14 Ways and Townson off and on during the years prior to</p> <p>15 the shooting; right?</p> <p>16 <b>A. From prior to -- I went to Number 10 in 2010, and that's</b></p> <p>17 <b>when I met them.</b></p> <p>18 Q. You met them both because you moved to the 10th</p> <p>19 Precinct?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. You didn't know them at all before?</p> <p>22 <b>A. No.</b></p> <p>23 Q. Okay. And then through your working together, you guys</p> <p>24 became good friends; right?</p> <p>25 <b>A. Yes.</b></p>	<p style="text-align: right;">Page 46</p> <p>1 or if there's a couple sergeants that oversee, who are</p> <p>2 they?</p> <p>3 <b>A. With Mr. Parker?</b></p> <p>4 Q. In August 2015, yeah.</p> <p>5 <b>A. Oh, my immediate supervisor was Anthony O'Rourke.</b></p> <p>6 Q. The same Anthony O'Rourke that was -- was that a Patrick</p> <p>7 O'Rourke who you were --</p> <p>8 <b>A. No. Those are two different people.</b></p> <p>9 Q. Okay. So --</p> <p>10 <b>A. And -- I'm sorry -- it's Patrick Rourke, not O'Rourke.</b></p> <p>11 Q. Okay. It's Patrick Rourke?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Okay. So, Anthony O'Rourke was your supervisor in</p> <p>14 August of 2015?</p> <p>15 <b>A. Yes, with this incident.</b></p> <p>16 Q. And so when you say "with this incident," you mean</p> <p>17 that's who came out that night from the 10th or --</p> <p>18 <b>A. After other supervisors came there, I called him --</b></p> <p>19 Q. Okay.</p> <p>20 <b>A. -- to see if he was still at the station and advise him</b></p> <p>21 <b>what had happened, because he was my immediate</b></p> <p>22 <b>supervisor. I was under his, what they call, span of</b></p> <p>23 <b>control.</b></p> <p>24 Q. Okay. And what put you under his span of control at</p> <p>25 that time?</p>

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1 A. I have no idea why they did that.  
2 Q. Who else's span of control were you under at that time;  
3 if anyone?  
4 A. That depends on the supervisors, ma'am. He was our  
5 special ops supervisor. I think I fell under his span  
6 of control because I was working days and he worked  
7 days.  
8 Q. Okay.  
9 A. If someone else -- if he was off work or if he was on  
10 military leave, the supervisors would switch up who was  
11 under your immediate span of control. I have nothing to  
12 do with that.  
13 Q. Okay. So, whether it's O'Rourke or anybody else in the  
14 10th Precinct, none of them have ever asked you any  
15 questions about Demar Parker; right?  
16 A. They asked me if I was okay after the incident.  
17 Q. Anything other than that?  
18 A. No.  
19 Q. None of those people who were in -- had you under their  
20 span of control have ever asked you anything about  
21 Crenshaw; right?  
22 A. No.  
23 Q. And none of them have asked you about the raid that  
24 became a shooting case relative to the whole narcotics  
25 team that you described; right?

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1 A. No.  
2 Q. And you don't know of any facts that would -- there's  
3 nothing that they would even discussed with you that  
4 would make you think they even know about that stuff;  
5 right?  
6 A. Just some things, what they may have heard.  
7 THE WITNESS: I need to step out and text my  
8 therapist and let him know --  
9 MS. PRESCOTT: Need to take a break?  
10 MR. PADDISON: Yeah.  
11 MS. PRESCOTT: Okay.  
12 (Short recess at 2:14 p.m.)  
13 \* \* \*  
14 (Record resumed at 2:20 p.m.)  
15 MR. PADDISON: Okay. During the break, I had an  
16 opportunity to speak with my supervisor regarding the  
17 testimony involving a shooting that occurred after the  
18 incident which gives rise to the subject matter of this  
19 lawsuit.  
20 After that discussion, I've been instructed to  
21 advise Officer Blanding as follows: Officer Blanding, I  
22 do not act as your attorney relevant to that incident.  
23 Do you understand that?  
24 A. Yes.  
25 MR. PADDISON: Do you understand that I am advising

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1 you that I believe it would be in your best interest to  
2 speak to an attorney regarding that incident?  
3 A. Yes.  
4 MR. PADDISON: I'm -- do you understand that I'm  
5 instructing you not to assert your Fifth Amendment  
6 right, but that you have the Fifth Amendment right not  
7 to testify regarding that issue?  
8 A. Yes.  
9 MR. PADDISON: Okay.  
10 Counsel, should it come to be that Officer Blanding  
11 has not taken his Garrity relevant to this incident --  
12 or -- excuse me -- related to this incident, or that  
13 he's released from testifying about it, I will stipulate  
14 to produce Officer Blanding to testify regarding the  
15 February -- excuse me, February 13th, 2017 shooting.  
16 MS. PRESCOTT: Okay. None of that whatsoever has  
17 anything to do with the civil lawsuit that we're here  
18 about today.  
19 MR. PADDISON: Actually, I think nothing --  
20 MS. PRESCOTT: Excuse me --  
21 MR. PADDISON: -- nothing about the February 13  
22 incident has anything to do about this civil lawsuit.  
23 MS. PRESCOTT: Okay. I'm just going to -- I'm just  
24 going to make my points; you've made yours.  
25 MR. PADDISON: Certainly.

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1 MS. PRESCOTT: I'm here today -- I'm here for the  
2 second time, my time having been completed wasted the  
3 last time around. I didn't make a big stink about it.  
4 I didn't ask anyone to pay any damages or costs, but  
5 here we sit. I'm not coming back down here a third  
6 time.  
7 This officer is individually sued in his own  
8 capacity. Accordingly, he's free to have whatever  
9 lawyer he wants here for his very own self. If he  
10 needed to bring someone else into this room, he could  
11 have done that. He hasn't done that.  
12 MR. PADDISON: He doesn't need to, not to testify  
13 about this incident.  
14 MS. PRESCOTT: Well, good. So, then -- so, then --  
15 MR. PADDISON: But to testify about a subsequent  
16 incident, he very well may.  
17 MS. PRESCOTT: I'm willing to put whatever we want  
18 to put on a separate record, but I'm going to ask my  
19 questions, and I'm going to interpret a refusal to  
20 answer as an assertion of the Fifth.  
21 And if that's -- I mean, you can't just say -- I  
22 mean, this isn't -- I know in the halls of congress,  
23 we're pretending like we can claim privilege, but we're  
24 not going to claim privilege, but we're going to say we  
25 might claim privilege, but here in this deposition

<p style="text-align: right;">Page 51</p> <p>1 that's not how it's going to roll.</p> <p>2 <b>BY MS. PRESCOTT:</b></p> <p>3 Q. How it's going to roll is, I'm going to ask my</p> <p>4 questions, and you can sit there silently and we can</p> <p>5 just assume what we want to assume from that, or we can</p> <p>6 take answers or do whatever you want to do.</p> <p>7 <b>MR. PADDISON:</b> Actually, I think the law is that</p> <p>8 you don't take an assumption of guilt from an assertion</p> <p>9 of the Fifth, but --</p> <p>10 <b>MS. PRESCOTT:</b> Well, that's in a criminal</p> <p>11 proceeding, but here we sit in a civil proceeding --</p> <p>12 <b>MR. PADDISON:</b> And I understand --</p> <p>13 <b>MS. PRESCOTT:</b> -- and I'm entitled to --</p> <p>14 <b>MR. PADDISON:</b> Counsel, would you like me to</p> <p>15 stipulate to produce him again should it come out that</p> <p>16 he can testify or no?</p> <p>17 <b>MS. PRESCOTT:</b> No. No.</p> <p>18 <b>MR. PADDISON:</b> Okay.</p> <p>19 <b>MS. PRESCOTT:</b> Because that doesn't -- that doesn't</p> <p>20 address the fact that I've had to prepare twice for</p> <p>21 this, and I'm not preparing a third time. That doesn't</p> <p>22 address it and nor should I have to and nor should my</p> <p>23 client be put to that expense and nor should I.</p> <p>24 So, we're just going to go through it, and, you</p> <p>25 know, he can assert the Fifth; he can answer the</p>	<p style="text-align: right;">Page 55</p> <p>1 (Non-excerpted testimony resumes.)</p> <p>2 <b>BY MS. PRESCOTT:</b></p> <p>3 Q. With regard to your relationship with the Defendant in</p> <p>4 this case, Mr. Townson, you -- nobody in DPD has ever</p> <p>5 asked you any questions about that relative to Demar</p> <p>6 Parker, have they? They have never delved into like how</p> <p>7 you guys go back, are you good friends, any questions</p> <p>8 like that, have they?</p> <p>9 <b>A. No.</b></p> <p>10 Q. And same with Ways?</p> <p>11 <b>A. No.</b></p> <p>12 Q. In other words, I'm right; it's been the same way with</p> <p>13 Ways?</p> <p>14 <b>MR. PADDISON:</b> Form.</p> <p>15 You can answer if you understood the question.</p> <p>16 <b>A. I don't get what you're asking.</b></p> <p>17 <b>BY MS. PRESCOTT:</b></p> <p>18 Q. Okay. I asked it in a way that makes the answer</p> <p>19 ambiguous. It's not your fault.</p> <p>20 Ways, it's the same thing? Nobody has ever asked</p> <p>21 you, relative to investigating the Parker matter, "Hey,</p> <p>22 how do you go back with Ways? How do you know the guy?</p> <p>23 Are you good --" those kinds of questions about your</p> <p>24 relationship?</p> <p>25 <b>A. No.</b></p>
<p style="text-align: right;">Page 52</p> <p>1 questions. It's really his choice.</p> <p>2 <b>BY MS. PRESCOTT:</b></p> <p>3 Q. You had left --</p> <p>4 <b>MS. PRESCOTT:</b> We can go on to the separate record,</p> <p>5 John.</p> <p>6 (Testimony from pages 53 and 54 excerpted</p> <p>7 and bound under separate cover.)</p> <p>8 *</p> <p>9 *</p> <p>10 *</p> <p>11 *</p> <p>12 *</p> <p>13 *</p> <p>14 *</p> <p>15 *</p> <p>16 *</p> <p>17 *</p> <p>18 *</p> <p>19 *</p> <p>20 *</p> <p>21 *</p> <p>22 *</p> <p>23 *</p> <p>24 *</p> <p>25 *</p>	<p style="text-align: right;">Page 56</p> <p>1 Q. Ways said that he couldn't really imagine a circumstance</p> <p>2 in which he would ever say anything bad about you.</p> <p>3 Do you feel the same way about him?</p> <p>4 <b>A. That I could say anything bad about him?</b></p> <p>5 Q. Yeah.</p> <p>6 <b>A. No.</b></p> <p>7 Q. Do you feel that -- I mean, can you picture a set of</p> <p>8 circumstances in which you would, you know, say anything</p> <p>9 negative about him?</p> <p>10 <b>A. No.</b></p> <p>11 Q. How about Townson?</p> <p>12 <b>A. No.</b></p> <p>13 Q. Both of them said that, you know, you got -- that they</p> <p>14 feel, you know, that they would take a bullet for you.</p> <p>15 Do you feel the same about Ways and Townson?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. You guys are all very good friends?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. You -- have you ever been in a position where you've</p> <p>20 given a statement as to another officer being accused of</p> <p>21 excessive force?</p> <p>22 So, somebody in your department, maybe, or your</p> <p>23 precinct, and they called you in, and you've given a</p> <p>24 statement about someone else being accused of excessive</p> <p>25 force?</p>

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1 A. I'm sure I have. But, like I said, I spent half my  
2 career in Narcotics and it was -- we were always getting  
3 complaints. But, again -- I don't know if you  
4 understand, and I'm not trying to give you a hard way to  
5 go -- it would be a complaint against the whole raid  
6 crew.  
7 Q. Okay.  
8 A. If you were -- for example, if you were involved in a  
9 raid, and even if you're in rear security, you still had  
10 to come down and make statements of what you heard and  
11 what you know of that's happened to each raid crew  
12 thousands of times.  
13 Q. And have you ever given a statement where you expressed  
14 the view that you thought someone did use force that was  
15 beyond what the situation called for?  
16 A. No.  
17 Q. And have you ever heard of any police officer saying  
18 another police officer used force beyond what a  
19 situation called for?  
20 A. No.  
21 Q. You've been an officer before, during and after  
22 something called a consent decree.  
23 Do you remember when that came and went?  
24 A. Yes.  
25 Q. What makes you sort of laugh about it?

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1 A. Nothing.  
2 Q. Well, something did.  
3 What was it?  
4 A. It's just stupid to me, but I didn't make the laws.  
5 Q. What about it was stupid?  
6 A. It's hard to explain, ma'am.  
7 Q. Well, do your best.  
8 A. Just certain laws that -- certain things that changes  
9 how you can work and --  
10 THE REPORTER: Excuse me?  
11 A. How we could work.  
12 THE REPORTER: Thank you.  
13 A. You know, more paperwork. You know, it was just extra  
14 paperwork where as opposed to back in the day you would  
15 do a PCR. Now they added extra, extra paperwork where  
16 an arrest would normally take 30 minutes. It would take  
17 almost an hour or whatnot.  
18 BY MS. PRESCOTT:  
19 Q. Do you understand why there was a consent decree?  
20 A. Yes and no.  
21 Q. What do you understand caused the consent decree to be  
22 entered?  
23 A. Something that happened, an investigation with several  
24 officers in the past and other cities and stuff,  
25 something the mayor, ex-mayor Dennis Archer had brought

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1 up.  
2 Q. Okay. Was there a pattern and practice of Detroit  
3 police officers using excessive force?  
4 A. I have no idea.  
5 Q. You're not sure?  
6 A. No.  
7 Q. Was there a failure to train them; if you know? Train  
8 the officers about use of force?  
9 A. You start having use of force classes when we go for our  
10 40-hour training.  
11 Q. Okay. But was there -- I mean, was that part of what  
12 went into the consent decree; if you know?  
13 A. I don't know.  
14 Q. Was there a history of unconstitutional police shootings  
15 here in Detroit?  
16 MR. PADDISON: Objection. Calls for speculation.  
17 Answer if you know.  
18 A. I have no idea.  
19 BY MS. PRESCOTT:  
20 Q. Okay. Was there a recurring problems with excessive use  
21 of force with citizens in Detroit?  
22 MR. PADDISON: Same objection ongoing.  
23 Go ahead and answer if you know.  
24 A. I have no idea.  
25 BY MS. PRESCOTT:

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1 Q. Was there a -- like a failure to kind of follow up when  
2 there were citizen complaints and, you know, get to the  
3 brass tacks about whether something real had needed to  
4 be done?  
5 A. I have no idea, ma'am. That's above my pay grade.  
6 Q. Okay. So, what -- so, some paperwork was instituted  
7 that made processing arrests more detailed. You just  
8 testified about that.  
9 Anything else that changed for you day-to-day  
10 before versus after the consent decree?  
11 A. No.  
12 Q. Okay. And do you -- in your 23 and a half years, have  
13 you ever known an officer to be disciplined because of  
14 excessive force?  
15 A. Did I work with one or have I heard rumors about one?  
16 Have I seen one or --  
17 Q. Well, let's start with any information you know about  
18 any particular person that was removed for excessive use  
19 of force.  
20 A. I just heard rumors of officers that were accused.  
21 But as far as me working with them, as it being my  
22 partner or whatnot, no.  
23 Q. Anyone you know of?  
24 A. No. I can't think of any names.  
25 Q. Okay. Was there an allegation with regard to Crenshaw

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1 that investigation into the situation was slanted or  
2 skewed because -- in your favor? Do you know that?  
3 **A. I had never got in any trouble before that, ma'am.**  
4 Q. Did you know that there was an allegation that the  
5 department covered for you in that situation?  
6 **A. No.**  
7 Q. And so you sit here today and you have no idea how much  
8 money has been paid in settling cases of excessive force  
9 involving you; right?  
10 **A. No.**  
11 Q. And you don't even know if \$1 has been paid at all; is  
12 that right?  
13 **A. No. I know that something was paid to Mr. Crenshaw, but**  
14 **they would not tell me the amount. They said I don't**  
15 **have to worry about that.**  
16 Q. And what about anybody else? Do you know whether any  
17 other money has been paid?  
18 **A. No.**  
19 Q. Okay. At have you ever heard of an officer being  
20 removed for or even disciplined for dishonesty in a use  
21 of force investigation?  
22 **A. I've heard of officers that's been what we call getting**  
23 **Giglio, but as far as --**  
24 **THE REPORTER: I'm sorry. "-- getting --"**  
25 **A. Giglio. Getting caught up in lies and testifying.**

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1 **But as far as me working with them and all that,**  
2 **no.**  
3 **BY MS. PRESCOTT:**  
4 Q. So, no one you know?  
5 Like you could give me a name?  
6 **A. No.**  
7 Q. How many times have you given Garrity statements?  
8 **A. Wow.**  
9 **Several.**  
10 Q. Can you -- could you put a specific number on it?  
11 **A. No.**  
12 Q. When was the last one?  
13 **A. With Mr. Parker.**  
14 Q. And how long before Parker was the one -- you know, like  
15 how long had it been by the time you go do the Parker  
16 one?  
17 **A. I couldn't give you a date on that.**  
18 Q. Okay. And you did say that you went down and that there  
19 was a time you talked to the union lawyer, the DPOA  
20 lawyer with regard to Parker. Putting that aside and  
21 putting aside the school, the kids, the report, I know  
22 you went to the Garrity.  
23 Did you ever have like a second Garrity or -- that  
24 came back around, the same ladies came back and asked  
25 you questions again about Parker?

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1 **A. As I recall, it was just one time.**  
2 Q. Okay. When we add in the Trask -- am I saying that  
3 right? Trask?  
4 **A. I believe so. I never knew that guy.**  
5 Q. Who was your partner with regard to that situation?  
6 **A. I was off duty.**  
7 Q. Okay. Okay. And you did tell me who was in your car.  
8 Okay. So, we have Trask and this February of '17  
9 thing and Parker and Crenshaw, and Edward Robinson,  
10 Junior, and the raid with the house with the dogs.  
11 Are there any other times where you shot someone on  
12 or off duty anywhere?  
13 **A. Just dogs.**  
14 Q. Okay. And had the dogs been with regard to raids in  
15 narcotic situations?  
16 **A. Yes.**  
17 Q. How many times have you shot a dog?  
18 **MR. PADDISON: Objection to relevance.**  
19 Go ahead and answer.  
20 **A. I can't count. I was the shotgun guy, so I was first**  
21 **person in.**  
22 **BY MS. PRESCOTT:**  
23 Q. Dozens and dozens?  
24 **A. I can't give you a count, ma'am.**  
25 Q. Is it -- I mean would you estimate it -- I don't need a

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1 specific count.  
2 What do you estimate?  
3 **A. It was a lot.**  
4 Q. Relative to -- okay. So, you're out with Ways on the  
5 night that the shooting -- well, what ultimately ended  
6 up happening with Parker, you had worked that day.  
7 How long had it been between work and when you  
8 started hanging out with Ways?  
9 **A. Well, when I got off work, I called to see where he was**  
10 **going to be at. I told him where I was going. He said**  
11 **they would be over there to meet me, and as soon as he**  
12 **got there -- I mean, within seconds -- he got the phone**  
13 **call from Townson.**  
14 **THE REPORTER: "-- from --"**  
15 **A. Townson.**  
16 **BY MS. PRESCOTT:**  
17 Q. Okay. And so where do you guys meet?  
18 **A. One of our friend's house that's close to the precinct,**  
19 **as I recall.**  
20 Q. Also an officer?  
21 **A. No.**  
22 Q. Oh, another friend's house. Okay.  
23 And had you been home already, or did you come  
24 straight from work?  
25 **A. No, I didn't go home first.**

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1 Q. Okay. And so when you're in the 10th Precinct, are you  
2 the kind of officer walking around in a DPD uniform?  
3 Are you in street clothes? Like what is your normal  
4 when you go out?  
5 **A. Department-issued special ops uniforms: Green pants,**  
6 **black shirt, badge on the outside, duty belt on the**  
7 **outside, issue black coat.**  
8 **I can't recall -- because I got issued two of them.**  
9 **One has your name on it and it has a badge, and then one**  
10 **doesn't, but they're both department-issued. It just**  
11 **depends on the weather.**  
12 Q. Okay.  
13 **A. And we also have hoodies that are marked, but it just**  
14 **depends on the weather.**  
15 Q. Okay. So, like in an August situation, you would have  
16 been wearing -- you still wear the pants and then the  
17 black shirt?  
18 **A. Yes. It was cold that day for some reason.**  
19 Q. It was a cold day?  
20 **A. Yeah.**  
21 Q. Okay. That happens.  
22 Okay. So, that's what you're wearing when you go  
23 hang out with Ways, go and hang out with him?  
24 **A. Well, we were going to the friend's house, and I know --**  
25 **out of habit, I normally keep different clothes in my**

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1 **car. So, I can't recall what had -- I know I had the**  
2 **pants on. I know I had the duty belt on. I know I had**  
3 **the shirt on. But as to what jacket I put on that day,**  
4 **I don't recall.**  
5 Q. Okay. And then do you ever change out of that stuff?  
6 **A. No.**  
7 Q. Okay. So, you're in that stuff.  
8 And then you get into his car when you guys take  
9 off, or he into yours, or how does that work?  
10 **A. I got in his car.**  
11 Q. Okay. Is that a personal car or a Detroit PD car? What  
12 was it?  
13 **A. Then that was his personal car.**  
14 Q. Did it become a City car?  
15 **A. No. He works somewhere else now, so that's why I'm**  
16 **saying it was his personal car.**  
17 Q. Okay. All right. So, you get in his car and you're --  
18 is there anyone else in the car?  
19 **A. No.**  
20 Q. And do you have like a radio that you keep with you for  
21 when you're on duty?  
22 **A. Yes. They did issue us one, but I'm sure mine was in my**  
23 **bag in my trunk.**  
24 Q. Okay. You don't remember having it that night?  
25 **A. I could have, but it would have been in my trunk.**

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1 Q. I guess I should have been clear.  
2 You don't -- you didn't have it when you were in  
3 the vehicle with Ways?  
4 **A. No.**  
5 Q. Okay. Does he have his?  
6 **A. I have no idea.**  
7 Q. Okay. And then you have your gun?  
8 **A. Department-issued gun.**  
9 Q. Uh-huh. And what do you do like with your -- do you  
10 carry handcuffs?  
11 **A. Yes.**  
12 Q. Okay. So, that's on your belt and whatnot?  
13 **A. Yes.**  
14 Q. Okay. And that stays --  
15 **A. On-duty belt.**  
16 Q. That whole stuff stays with you the whole night?  
17 **A. Yes.**  
18 Q. So, what else is on there? Like mace?  
19 **A. Extra mags, pepper spray, flashlight, emergency gloves,**  
20 **the holster, my PR-24 clip, but I don't -- I know I**  
21 **wouldn't have carried that off duty. It would have been**  
22 **in my duty bag.**  
23 Q. Okay. So, those are things on your belt and you're in  
24 the truck with him. And you take off just driving.  
25 You're not sure where you're going, or do you like get

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1 the call and not go anywhere until you get the call?  
2 **A. Ways got the call.**  
3 Q. Okay. So, Ways gets a call.  
4 And what's the first you know of what's going on?  
5 What do you first hear?  
6 **A. I said -- I asked him, "What's up?"**  
7 **And he said -- well, his exact words was, "CT's son**  
8 **is in trouble."**  
9 Q. Okay. CT was the nickname you guys used for him?  
10 **A. For Townson.**  
11 Q. Yeah.  
12 And one of you is Junior?  
13 **A. Me.**  
14 Q. You. Okay.  
15 And so do you know Townson's son's mom at all?  
16 Her name is Sanchez.  
17 **A. Never -- never met her.**  
18 Q. Okay. And so you don't know anything about Parker and  
19 Sanchez and Townson and any of that?  
20 **A. Nothing.**  
21 Q. Okay. So, Ways says Townson's kid is in trouble.  
22 And what else does he say?  
23 **A. He's back and forth trying to call Ways, like his phone**  
24 **kept going to voice mail. Then they were back and forth**  
25 **calling each other.**

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1 Q. Okay. Why? Like what's --  
2 **A. Because he's trying to see -- I had never been over to**  
3 **that house.**  
4 Q. Okay.  
5 **A. Never met that man, never -- I never even knew where his**  
6 **son -- I seen his son before, but I think he came with**  
7 **him to the precinct before.**  
8 Q. Okay.  
9 **A. But Ways knew apparently where she lived, and where his**  
10 **son had lived.**  
11 Q. Okay.  
12 **A. I didn't.**  
13 Q. Okay. So, like -- so, is the calling trying to meet up?  
14 **A. See where he's at.**  
15 Q. Get to where --  
16 **A. See where he's at and see what's going on.**  
17 Q. Okay. All right. And so you hear that the son is in  
18 trouble; right?  
19 **A. Yes. He said -- all I heard him say, "Daddy, help me.**  
20 **Come get me," or something.**  
21 Q. Okay. And part of the discussion, too, is to see who is  
22 closest and who can get there fastest?  
23 **A. Yeah. Because I knew -- I remember him saying -- asking**  
24 **where he was at. He didn't know I was with Ways at the**  
25 **time until -- once he did talk to him, he said, "Junior**

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1 **is with me."**  
2 **But I knew for a fact that Ways stayed, at the**  
3 **time, way out in Southfield. So, I guess he was -- I'm**  
4 **assuming he was calling to see who was closer to get to**  
5 **that house.**  
6 Q. Between you and --  
7 **A. No. Between Ways and Townson.**  
8 Q. Okay.  
9 **A. I just happened just to be getting ready to hook up with**  
10 **Ways.**  
11 Q. When you -- you don't have any personal anything going  
12 on in this house at any time that you're heading over to  
13 Sanchez's house?  
14 **A. No.**  
15 Q. And -- but that's not something that -- has anyone ever  
16 asked you about that before now that you can recall?  
17 **A. I've never even met her, ma'am.**  
18 Q. I know.  
19 But like at DPD, when they were looking into this,  
20 did anyone ever say like, "Do you know this lady? Do  
21 you know anything about her?"  
22 **A. I'm sure they have, but I can't recall exactly what was**  
23 **asked.**  
24 Q. Okay. Would everything that you know of the questions  
25 you got asked be whatever we have from Garrity?

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1 **A. Yes.**  
2 Q. Okay. And with regard to when you gave your Garrity  
3 information, were you honest with them?  
4 **A. Yes.**  
5 Q. Okay. And when you wrote your report about what  
6 happened, you know that you're doing that in your  
7 capacity as a police officer, and you have to be  
8 complete and honest and correct with that; right?  
9 **A. Yes, ma'am. I have a good record.**  
10 Q. And when you did complete a report about this incident,  
11 were you honest in it?  
12 **A. Yes.**  
13 Q. Okay. And did you give complete information in it?  
14 **A. Yes.**  
15 Q. Did you leave out anything, you know, omit anything  
16 major that happened or --  
17 **A. No.**  
18 Q. Okay. So, when was the last time you saw your report  
19 about this incident?  
20 **A. Earlier today.**  
21 Q. Okay. And when was the last time before that?  
22 So, like, I mean had you just put it into the  
23 system and then today was the next time, or was there  
24 something in between?  
25 **A. They give you a report when you -- as I recall, when you**

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1 **go to Garrity to refresh your memory.**  
2 Q. Uh-huh. Was there anything that occurred on the night  
3 of the shooting that wasn't part of the report for any  
4 reason?  
5 Like the before stuff or the after stuff or  
6 anything?  
7 **A. No.**  
8 Q. Okay. And the report that you write up is made the same  
9 night as the shooting; right?  
10 **A. Yes.**  
11 Q. And that's so that you can quickly get down the detail  
12 while you remember it the best; right?  
13 **A. Yes.**  
14 Q. What else did you look at today?  
15 **A. That's it.**  
16 Q. Just your report?  
17 **A. Yes.**  
18 Q. Have you ever listened to your Garrity statement?  
19 **MR. PADDISON: You can answer.**  
20 **A. Yes.**  
21 **BY MS. PRESCOTT:**  
22 Q. When was the last time you listened to that?  
23 **A. Today.**  
24 Q. Okay. So, other -- so, other than the Garrity and the  
25 report, is there anything that you looked at, listened

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1 to, touched, examined, anything?  
2 A. No.  
3 Q. Okay. So, those are the two things?  
4 There's nothing else?  
5 A. As far as me, yes.  
6 Q. Okay. And is there -- have you read the lawsuit in this  
7 case?  
8 A. Advised of bits and pieces of it.  
9 Q. When was the last time you looked at the Complaint?  
10 A. I never personally just looked at it. I was just  
11 advised of bits and pieces of it.  
12 Q. I see. And relative -- excuse me.  
13 Have you listened to Ways' or Blanding's Garrity  
14 statements?  
15 A. I am Blanding.  
16 Q. I apologize.  
17 Ways' or Townson's Garrity statements?  
18 A. No.  
19 Q. Have you ever seen a transcript of anybody's anything in  
20 this case? Garrity, deposition, anything?  
21 I can show you what it looks like. A transcript  
22 would be like --  
23 MR. PADDISON: She's just asking about if you  
24 reviewed --  
25 BY MS. PRESCOTT:

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1 Q. -- questions and answers.  
2 THE REPORTER: Excuse me?  
3 MR. PADDISON: She's just asking about if you've  
4 reviewed Blanding's or --  
5 A. Oh.  
6 BY MS. PRESCOTT:  
7 Q. What was said, questions and answers.  
8 A. No.  
9 Q. Okay. Have you read Ways' or Townson's reports from the  
10 night of the incident?  
11 A. As a practice, you will always read your partner's  
12 report or your partner reads your report. Your  
13 supervisor reads your report, you know, spelling and all  
14 this, and going over penmanship, you know, before you  
15 submit it, so that you don't get the report back the  
16 next day and have to make corrections.  
17 Q. Okay. So, the night that you guys would have written  
18 your reports, you would have seen each other's reports  
19 before they were finalized?  
20 A. I can't remember if they separated us.  
21 Yeah. They did separate us for a minute, and  
22 they -- I was spoken to by Force Investigation, Internal  
23 Affairs, and they were spoke to by Force and Internal  
24 Affairs, and that's when they told us we can go ahead  
25 and do our reports.

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1 Q. Okay. Who at Force and/or IA talked to you before you  
2 did your report?  
3 A. I don't know, ma'am. There were so many people there.  
4 Q. Did you -- were you asked questions -- I mean, was  
5 there -- did you just say what happened, or did they  
6 just say, "Here is what's going to happen. You know,  
7 here is how we're going to handle this"?  
8 A. I can't remember, ma'am. It was confusing. There was a  
9 bunch of people there.  
10 Q. So, you call in your union rep and -- right?  
11 A. I didn't.  
12 Q. Your union rep --  
13 THE REPORTER: I'm sorry. "Did" or "did not"?  
14 A. I said I did not.  
15 THE REPORTER: Thank you.  
16 BY MS. PRESCOTT:  
17 Q. Your union rep shows up.  
18 A. A union rep would show up.  
19 Q. Okay.  
20 A. But as far as if it's the one from the 10th Precinct, I  
21 don't have any idea.  
22 Q. Okay. Relative to anyone from Force or IA on the night  
23 of the shooting, can you recall any questions that  
24 anyone asked you that night?  
25 A. Just if I was okay.

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1 Q. Okay. But you said that they separated you, so that --  
2 I thought maybe they questioned you some, but you don't  
3 remember any questions?  
4 A. No. They separated us. I can't remember the guy's  
5 name. One of the union guy's came. For some reason it  
6 was cold that day. I sat there in the car and just  
7 waited until they said I was clear to go back to the  
8 station and do paperwork.  
9 Q. Okay. So, then you and Ways and Townson go back to the  
10 station?  
11 A. Not together.  
12 Q. Right, but, I mean -- well, whose car did you go in?  
13 A. It was either some of the guys from the night crew, a 30  
14 Series, or -- I can't remember if one of the supervisors  
15 took me or -- I can't remember. But I did not ride with  
16 Ways and Townson.  
17 Q. Okay. Does Ways drive his car in?  
18 A. I believe he did.  
19 Q. Okay. And then so you write your report. And then  
20 before it's finalized, you go through the process you  
21 described earlier of exchange them, and then the  
22 sergeant looks at them as well?  
23 A. Yes.  
24 Q. Okay. So, is that the last time you reviewed Ways and  
25 Townson's reports?

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1 A. I believe so, yes.  
2 Q. Okay. So, you know you're going to be going to -- at  
3 some point along the line you are told that you're going  
4 to go to Curtis and Mendota to help Townson's kid?  
5 A. To see what was wrong, yes.  
6 Q. And the goal of getting over there is to go help keep  
7 the peace?  
8 A. To see what -- we was going to see what was wrong,  
9 ma'am. I had no idea what they were -- they were  
10 talking on the phone.  
11 Q. Ways and Townson were?  
12 A. Yes.  
13 Q. Okay. And so what you know is the kid is calling for  
14 help?  
15 A. Yes.  
16 Q. What about 911?  
17 Had someone tried calling 911?  
18 A. I have no idea.  
19 Q. Okay. And the first you see Townson that night is  
20 where?  
21 A. When we got there, he was squared off in the street as  
22 if he was about to fight Mr. Parker.  
23 Q. Do you see him before you arrived at Curtis and Mendota?  
24 A. No.  
25 Q. When was the last time before Curtis and Mendota and the

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1 night -- and you just described squaring off.  
2 When was the last time, back in time from then,  
3 that you had seen Townson? Like had you seen him at  
4 work earlier that day or 10 minutes before at the  
5 7-Eleven, or it had been a week or what?  
6 A. No. He has been off with some injury. But I would call  
7 and check on him.  
8 Q. Okay. So, it had been a while since you had seen him?  
9 A. Physically, yes.  
10 Q. Okay. But -- physically laid eyes on him, but you kept  
11 in touch, is what you're saying?  
12 A. Yes.  
13 Q. Okay. So, you did not meet with him ahead of going to  
14 Curtis and Mendota?  
15 A. No.  
16 Q. Okay. Do you know why Officer Ways says under oath  
17 that, yes, you did?  
18 A. I didn't. We didn't.  
19 Q. Okay. Officer Ways is honest, isn't he?  
20 A. Yes. He apparently knew where he was going. I have  
21 never been to that house. I didn't know where the  
22 baby's mother lived or nothing.  
23 Q. Okay. But -- so, you didn't stop in a parking lot and  
24 meet up with Townson and drive over to Curtis and  
25 Mendota together and arrive together?

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1 A. No.  
2 Q. Okay. So, Ways is lying if that's what he says is what  
3 went down?  
4 MR. PADDISON: Mischaracterizes his testimony.  
5 BY MS. PRESCOTT:  
6 Q. Is Ways lying?  
7 A. No.  
8 Q. Well, then what do you think is going on?  
9 A. I don't know, ma'am. He was on the phone with him. So,  
10 I don't know if he was telling him the address or  
11 whatever. I don't know if he followed him or what. But  
12 we -- I know we didn't stop.  
13 Q. You didn't go to the Northwest Activity Center?  
14 A. No.  
15 That incident was not far from there --  
16 Q. Okay.  
17 A. -- actually.  
18 Q. But you didn't meet Townson at the Northwest Activity  
19 Center before going over to Curtis and Mendota?  
20 A. No.  
21 Q. So, if Ways said you did, then that is untrue; right?  
22 MR. PADDISON: Objection. Calls for speculation.  
23 BY MS. PRESCOTT:  
24 Q. Right?  
25 A. I don't remember us stopping, ma'am.

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1 Q. Well, do you just not remember and you think it's  
2 possible or what?  
3 A. Like I said, they were on the phone back and forth,  
4 going back and forth. So, I don't know -- I don't even  
5 recall -- when I first saw them, they were squared off  
6 in the middle of the street.  
7 Q. Okay. My question to you is, you did not connect with  
8 Officer Townson and meet up with him at Northwest  
9 Activity Center?  
10 A. No.  
11 Q. Okay. And Ways answered that same question "yes."  
12 So, he is giving untrue information; right?  
13 MR. PADDISON: I think you're asking two different  
14 people the same question. The answers could be  
15 different and both be true.  
16 MS. PRESCOTT: Okay. I'll just ask him.  
17 A. I don't recall stopping, ma'am. I know when we got  
18 there, I saw them squared off in the street. I know  
19 what car was Townson's, and I saw his car parked in  
20 the -- in a driveway.  
21 BY MS. PRESCOTT:  
22 Q. And you didn't follow him over to Curtis and Mendota?  
23 You didn't follow Townson to Curtis and Mendota from the  
24 Northwest Activity Center?  
25 A. Again, when I got there, they were already squared off

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1 in the street. You could see Townson's car parked in a  
2 driveway.  
3 Q. Okay. So, you didn't all exit your vehicles together at  
4 the same time; right?  
5 A. Ways and I did.  
6 Q. But not with Townson; right?  
7 A. No.  
8 Q. So, if Ways said, yes, you did, that's also untrue  
9 information; right?  
10 A. Ma'am, I'm telling you what happened.  
11 Q. Okay. And the answer is, you did not exit your vehicles  
12 at the same time as Townson because, according to you,  
13 he was already standing in the street; right?  
14 A. Yes.  
15 Q. Okay. So, what we'll do is -- I've just taken a north,  
16 west, east, south look at how Mendota and Curtis run.  
17 We'll mark it as Exhibit 1.  
18 (Deposition Exhibit 1 marked  
19 for identification.)  
20 MR. PADDISON: I'll just place an objection due to  
21 the fact that the drawing marked as Exhibit 1 is not to  
22 scale.  
23 BY MS. PRESCOTT:  
24 Q. Okay. Can you in your -- with your red, can you mark an  
25 "X1" where you -- where the car pulls up?

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1 So, you're in the car with Ways. And so I'm  
2 talking about "X1" will be your car -- the car -- his  
3 car, the car you're riding in.  
4 A. (Drawing diagram.)  
5 Q. Okay. Thank you.  
6 And then I'm going to hand you green, and if you  
7 could put an "X2" where you see Townson at that time?  
8 So, it's as you pull up.  
9 A. I couldn't see the count of the houses that they were  
10 down from.  
11 Q. Okay. Okay.  
12 A. I couldn't --  
13 Q. About where do you think he was, not -- understanding  
14 that you're not taking -- you're not going to agree or  
15 disagree about where the houses sit or how many there  
16 are.  
17 About where do you think Townson is?  
18 A. You said mark it how?  
19 Q. "X2."  
20 A. It was further down the block, ma'am. I think it was  
21 more houses.  
22 Q. Okay. So, ignore --  
23 A. If I were to guess, I would say between here and here.  
24 Q. Okay. So, you can draw in a circle and mark an "X2"  
25 where around it would have been. That's fine. It

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1 doesn't have to be exact.  
2 A. (Drawing diagram.)  
3 Q. Okay. So -- okay. So, that's -- if that represents  
4 Townson, how far away from Parker from Townson? Is he a  
5 house away? Is he, you know, a foot away?  
6 Why don't we have Parker be blue, and do an "X3."  
7 A. (Drawing diagram.)  
8 Q. Is he closer to you? Further from you?  
9 A. They were right in the street in front of the house.  
10 Q. Okay. And how close to each other are they relative to  
11 how, you know --  
12 A. They were -- like I said, they were squared off as if  
13 they were going to fight.  
14 Q. Okay. So, they were arm's length apart? Is that what  
15 you're trying to say?  
16 A. From what I could see, that's what I would say.  
17 Q. Okay. Okay. So, draw in as best you can Parker in blue  
18 with an "X3."  
19 A. Okay.  
20 Q. Okay. And -- okay. And do you get out? What do you do  
21 as soon as you pull up?  
22 A. I get out the passenger side, and I look down the  
23 street, and that's when I saw them squared off. You  
24 could hear them arguing, but as to what they were  
25 saying, I had no idea.

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1 Q. Okay. So, when you get out, does Ways get out or does  
2 he sit?  
3 A. He gets out.  
4 Q. Okay. And so do you start walking? Do you sit tight?  
5 What do you do?  
6 A. Ways was ahead of me. He started walking down there. I  
7 stayed near his vehicle the whole time because I was  
8 trying to see what was going on, see who else was out  
9 there.  
10 Q. Okay. So, can you draw Ways' path with the red?  
11 So, Ways is red, and he starts at "X1."  
12 Tell me -- show us on the thing where he gets to.  
13 A. About down here.  
14 Not all the way quite to them.  
15 Q. Okay. So, why don't you do an "X4" about where you  
16 think he stops?  
17 I mean, you drew a little arrow to where -- what  
18 direction he went, but does he stop, or is he just  
19 heading that way?  
20 A. He stopped because he took off running.  
21 Q. Okay. So, Ways stops because Parker takes off?  
22 A. Yes. He takes off running.  
23 Q. Okay. So, did Ways only get as close to Parker as  
24 you've drawn in on Exhibit 1 so far?  
25 A. I couldn't give you the exact, ma'am. It was dark out

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1 there. Right here was a streetlight. I'm watching what  
2 was going on, assessing the situation.  
3 Q. Okay.  
4 A. Ways starts going down there as soon as he says, "Oh,  
5 it's like that. I've got something for you, niggers,"  
6 and he took off. That's when I told him to start coming  
7 back.  
8 Q. Okay. So, how long are you basically at 1 -- "X1"  
9 before you -- do you see Parker running?  
10 A. Yeah, I could see somebody take off.  
11 Q. Okay. And how long are you hanging out at -- around  
12 "X1" before that happens?  
13 A. Once I saw him take off, I'm yelling at Ways to come on,  
14 to come back. CT was yelling for his son to get his  
15 stuff, get his stuff, "Let's go. Let's go. Let's go."  
16 Q. Okay. But I'm just trying to get a sense of how long  
17 you're there before running occurs, running off.  
18 A. Within seconds.  
19 As soon as he saw Ways and -- walking down there,  
20 that's when he took off.  
21 Q. Okay. So, we drew in Ways walking along Curtis  
22 eastbound, and you stay by the car on the curb, which is  
23 the southwest curb?  
24 A. Yes.  
25 Then I later had walked over, but I still stayed

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1 close to his vehicle.  
2 Q. Okay. So, let me just unpack a couple of things  
3 backwards with some things you said in follow-up.  
4 So, are you hearing what Parker and Townson are  
5 saying to each other?  
6 A. Just -- not verbatim, just them arguing.  
7 Q. So, you know that there's an argument, but you don't  
8 hear any of the words?  
9 A. No.  
10 Q. Okay.  
11 A. Only words I heard was, after I heard him say, "Oh, it's  
12 like that. I've got something for you, niggers," then  
13 once he took off, I heard Townson yelling to his son,  
14 "Come on. Get your stuff. Let's go. Let's go. Let's  
15 go."  
16 Q. Okay. Where is Parker when you say he said what you  
17 just testified to twice?  
18 A. He took off northbound.  
19 Q. Is he at "X3" when you hear that?  
20 A. Approximately, ma'am. It happened so quick. They were  
21 squared off. Assuming when he saw Ways, that's when he  
22 took off.  
23 Q. Okay.  
24 A. And I didn't see him. I didn't know -- I was so far, I  
25 couldn't tell if he went to a house, or if he went

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1 between houses.  
2 Q. Okay. And so -- but he says this, "Oh, it's like that"  
3 and "I've got something for you," he -- before he's --  
4 or as he's running away or before he runs --  
5 A. That's not what he said. He said, "I've got something  
6 for you, niggers."  
7 Q. Okay. When? Is he running?  
8 A. Once he looked down and saw Ways walking.  
9 Q. Okay. So, before he takes off running?  
10 A. Yes.  
11 Q. Okay. And you never hear any other words that he or  
12 anybody else says?  
13 A. No.  
14 Q. You don't hear anything Ways says to anybody?  
15 A. No.  
16 Q. Like does Ways talk to Parker?  
17 A. No. Again, from what I saw, he didn't get a chance.  
18 Q. Okay. And so if he testified that he was talking to  
19 Parker, you just couldn't hear that?  
20 A. I couldn't hear nothing, ma'am. I heard what he was  
21 saying and I'm assessing the situation. From here was  
22 the only street light. Down there it was dark.  
23 Q. Okay. And so --  
24 A. And I could see Townson's car only because it's silver.  
25 Q. Okay. Is Parker -- does he have his shirt on? Does he

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1 not have his shirt on?  
2 A. As I recall in my report, he had on a tank top.  
3 Q. Okay. Did you ever see him with his shirt off that  
4 night?  
5 A. Not that I recall.  
6 Q. And you say -- okay. So -- when you say that Parker and  
7 Townson are squared off, do they ever lay any hands on  
8 each other?  
9 A. Not that I saw.  
10 Q. Do either of them ever try to take a swing at either  
11 one?  
12 A. Not that I saw.  
13 Q. Did you ever see any contraband on Parker that night?  
14 Any drug paraphernalia, anything stolen, any weapons,  
15 anything?  
16 A. I saw a gun later when he came back down Mendota.  
17 Q. Okay. Anything other than that?  
18 A. No.  
19 Q. All right. And Ways is armed at the time he leaves the  
20 car; right?  
21 A. I don't know.  
22 Q. Did he have a gun that night at all?  
23 A. I don't know.  
24 Q. Okay. And do you -- Ways testified that Parker said, "I  
25 ain't about to fight you because you brought your boys

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1 here to jump me."  
2 Do you remember that?  
3 **A. I didn't hear any of that.**  
4 Q. Okay. And can you draw -- so, we have Parker standing  
5 there with the blue "X3."  
6 Can you draw his path as he runs away?  
7 **A. He ran somewhere northbound. Like I said, I was so far**  
8 **I couldn't tell if he went into a house or if he went**  
9 **between the houses. That's how far I was.**  
10 Q. Okay. So, he didn't come west -- he didn't use the  
11 streets like to come west on Curtis and then take a  
12 right up Mendota, like close to you and then take a  
13 right up Mendota?  
14 **A. Not that I recall. I just remember him disappearing out**  
15 **of my eyesight.**  
16 Q. Okay.  
17 **A. That's when I started calling for him to come back. The**  
18 **next thing I know his car came down Mendota.**  
19 Q. So, Ways is our person in red. We see where he's walked  
20 to. And then does he turn around and go west along  
21 Curtis and turn up Mendota, or does he cut through the  
22 houses?  
23 **A. You mean as far as did he chase him?**  
24 Q. Well, we know -- did he chase him?  
25 **A. No.**

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1 Q. Ways didn't?  
2 **A. No.**  
3 Q. Okay. So, Parker is up with his -- you know, his blue  
4 arrow to the north.  
5 **A. Uh-huh.**  
6 Q. And your -- and Ways has walked down Curtis but you're  
7 just saying, "Come on. Let's go." And he turns back  
8 around and walks back down Curtis?  
9 **A. He's turning around and coming back to me because I**  
10 **didn't know where he was going, who he had with him,**  
11 **what he was going to do.**  
12 Q. Okay. And so you said you saw a car -- you said, "And  
13 then we saw a car."  
14 You saw a car with Parker?  
15 **A. Yes.**  
16 Q. Okay. So, at the time you see the car, had you been on  
17 the scene for a minute, 10 minutes, an hour? Like how  
18 long had you been there?  
19 **A. Maybe a couple of minutes.**  
20 Q. Okay. And so when you see the car, can you draw  
21 yourself -- you were -- what's -- I don't know that  
22 we've really --  
23 **MR. PADDISON: We haven't given him --**  
24 **BY MS. PRESCOTT:**  
25 Q. -- put much of you on there.

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1 Do you mind being purple?  
2 It's purple. Snazzy color.  
3 All right. So, you get out of the car, and can you  
4 draw where you are when you see the car?  
5 **A. What am I? "X4"?**  
6 Q. So, you were at "X1," where the car was.  
7 **A. Uh-huh.**  
8 Q. All right. And you're going to be purple. And you get  
9 out of the car, and you said you moved across the street  
10 or across the intersection or what?  
11 **A. Yes.**  
12 Q. Okay. So, draw your path from getting out of the car to  
13 where you end up.  
14 **A. (Drawing diagram.)**  
15 Q. Okay.  
16 **A. Somewhere right --**  
17 Q. Okay. And put yourself as an "X4" there.  
18 **A. (Drawing diagram.)**  
19 Q. Okay. So, we can -- later, we'll go back, and we'll  
20 know what we're talking about.  
21 Okay. So, now I'm going to ask you a couple  
22 questions.  
23 Did you ever go further east than "X4" on the night  
24 in question --  
25 **A. Maybe --**

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1 Q. -- before the shooting?  
2 **A. Maybe a house or so, but I was looking and listening and**  
3 **listening for CT to get his son. I still had no idea**  
4 **what was going on, but I was looking because, like I**  
5 **said, after he made that comment, I was just on alert to**  
6 **see where he went, where he was coming out at and**  
7 **whatnot.**  
8 Q. Okay. So, maybe you went a little bit further east, but  
9 did you ever make it down to where "X2" and "3"ish area  
10 were?  
11 **A. Never.**  
12 Q. Okay. All right. So, there you are.  
13 And "X4" is where you are when you see Parker's  
14 car?  
15 **A. No. I hear it.**  
16 Q. You hear the car? Okay.  
17 **A. I hear a car.**  
18 Q. You hear a car.  
19 Where is Ways at that point?  
20 Can you draw him in red with an "X5"?  
21 **A. At that time he may have gotten to here in the street.**  
22 Q. Okay. Now, Parker is blue, so where is the car when you  
23 first make visual contact with the car?  
24 **A. I hear a car squealing tires.**  
25 Q. Up -- you're pointing up Mendota north?

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1 A. **It's coming from this area.**  
2 Q. Okay. So, it's -- and do you see the car coming south  
3 on Mendota?  
4 A. **Yes.**  
5 Q. Okay. And so that's -- and what -- it was a -- Parker?  
6 A. **It was a silver Cadillac, yes.**  
7 Q. Okay.  
8 A. **It was Parker.**  
9 Q. Okay. You didn't know his name. I get that.  
10 A. **No.**  
11 Q. Okay. So, what happens as he comes down --  
12 A. **Mendota.**  
13 Q. -- Mendota?  
14 A. **As he's coming down, he came this way, he turned, and he**  
15 **said, "What's up now, niggers?"**  
16 **He didn't -- I don't know if he saw me because I**  
17 **was standing over there.**  
18 **The next thing you know, the window was down. Like**  
19 **I said, for some reason in August that day, it was cold**  
20 **as hell, and I saw he had a gun in his hand, and he**  
21 **turned the corner real hard, and he was going straight**  
22 **at Ways.**  
23 Q. Okay. So -- so, can you draw in the blue -- we don't  
24 necessarily have the whole of Mendota, but the path he's  
25 coming is south on Mendota?

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1 A. **Yes.**  
2 Q. Okay. So, draw that.  
3 A. **(Drawing diagram.)**  
4 Q. And then he turns. And then does he slow down, or  
5 what's going on?  
6 A. **No. That's when I said he couldn't see me from where I**  
7 **moved on to the west side of the street, but I can see**  
8 **him heading -- and he had his window down when I saw the**  
9 **gun and him turning and going straight at Ways. That's**  
10 **when I fired.**  
11 Q. Okay. How fast was he going?  
12 A. **Like I told them, approximately 20 miles an hour. He**  
13 **bent that corner kind of hard.**  
14 Q. Do you remember saying he was driving 25 to 30 miles an  
15 hour with tires squealing?  
16 A. **I said approximately. Approximately, ma'am.**  
17 Q. If you said in the Garrity 25 to 30, is that what you  
18 remember?  
19 A. **That's what I remember.**  
20 Q. Okay. It was very dark; right?  
21 A. **Yes.**  
22 Q. And -- okay. So -- okay.  
23 Where is the gun that you say --  
24 A. **In his right hand.**  
25 Q. Okay. So, which windows were down?

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1 A. **Just the driver's window.**  
2 Q. Okay. And then where is -- so, do you say anything to  
3 him?  
4 A. **To who?**  
5 Q. To Parker.  
6 A. **No. I didn't have time.**  
7 Q. Too fast of a rate of speed?  
8 He's driving too fast?  
9 A. **Yeah. Things were going on fast. When I saw the gun**  
10 **and saw him turn that corner hard, going at Ways, that's**  
11 **when all hell broke loose.**  
12 Q. Okay. And so then what happens?  
13 A. **Then I fired in his vehicle into the window, into the**  
14 **driver's side of the vehicle.**  
15 Q. Okay. So, he -- had he come around the corner at that  
16 point, like by the time you start shooting?  
17 A. **He was -- yes. He was bending the corner.**  
18 Q. I mean, you -- your police report says you -- as you  
19 shot -- he was coming south on Mendota, and then you  
20 shot, and then he turned.  
21 Do you recall that?  
22 A. **I recall him coming -- flying down the street. As to**  
23 **what angle -- south down Mendota. To what angle I**  
24 **started firing, he couldn't see me. He was going**  
25 **straight at Ways when I saw his window down with a gun.**

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1 Q. Okay. Okay. So, he -- where is -- can you draw "X" --  
2 is "X5" where Ways is when you shoot?  
3 A. **If the vehicle is going there, he was walking back.**  
4 Q. Okay. And is "X5" about where you are?  
5 A. **Approximately.**  
6 Q. Okay. And are you at "X4"?  
7 A. **Yes.**  
8 Q. Okay. And so -- and where is the car compared to Ways?  
9 A. **Going straight at him.**  
10 Q. Okay. And so does Ways have his gun, at this point,  
11 out?  
12 A. **I couldn't see that.**  
13 **Ways, sometimes when he's off duty, he would leave**  
14 **it in the car and whatnot. So, I didn't -- I don't**  
15 **know.**  
16 Q. Okay. Do you ever see Parker's car west of Mendota on  
17 Curtis that night?  
18 A. **I don't recall.**  
19 Q. Did you ever see his car going west on Curtis? Because  
20 I know you've drawn in that he turns to go left and go  
21 east on Curtis.  
22 A. **Yes.**  
23 Q. So, do you ever see him going west on Curtis at any  
24 point that night?  
25 A. **I don't recall. It happened so fast.**

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1 Q. Well, the -- I mean, he comes south and drives past, and  
2 the shooting happens, and then he drives off which  
3 direction?  
4 **A. After Ways got out of the way, he went eastbound on**  
5 **Curtis, and then he went -- I don't know if it was this**  
6 **street or the next street that he went southbound on.**  
7 Q. Okay. So, all you know is you see taillights going, and  
8 then you see him eventually turn southbound?  
9 **A. Yes.**  
10 Q. Okay. And you had a bullet in the chamber, and then a  
11 full clip of 15?  
12 **A. Yes.**  
13 Q. And so you shoot 16 times; right?  
14 **A. I don't recall how many times I shot.**  
15 Q. Do you -- did anyone else shoot?  
16 **A. No.**  
17 Q. And is there anything else that Parker does that night  
18 that -- that you haven't described?  
19 **A. I was later advised, when I was at the station, from**  
20 **another supervisor.**  
21 Q. Okay. Let me back up.  
22 Is there anything that Parker does that night that  
23 you observed that we haven't now covered?  
24 **A. Once I started shooting at him --**  
25 Q. Yeah.

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1 **A. -- and saw the gun, and he was going at Ways, it**  
2 **startled him.**  
3 Q. Okay.  
4 **A. He swerved. Then that's when he went down one of those**  
5 **side streets southbound.**  
6 Q. Okay. And so can you draw the swerve in as --  
7 **A. I can't tell you exactly how that was, ma'am. It**  
8 **happened so quick.**  
9 Q. Okay. And so is the -- so, your sense of it was that he  
10 never knew you were there other than the -- once the  
11 shooting, and that's what startles him?  
12 **A. Exactly.**  
13 Q. Okay. So, then he jerks the wheel?  
14 **A. Away from Ways, yes.**  
15 Q. Okay. And is Ways in the middle -- it looks like you've  
16 drawn him basically in the middle of the street?  
17 **A. He was coming -- walking back towards me.**  
18 Q. Down the middle of Curtis?  
19 **A. Yes.**  
20 Q. Okay. And so you're not sure if he jerked left or he  
21 jerked right? Parker, you know, swerved left or swerved  
22 right?  
23 **A. I saw Ways jump out of the way of the vehicle. I know**  
24 **when I started firing, it startled him. He had his**  
25 **window down. He had a gun in his right hand. Then**

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1 **he -- I can't tell you if it was Birwood or the next**  
2 **street because it happened so fast.**  
3 Q. Okay. What was he doing with the gun?  
4 **A. I thought he was getting ready to shoot at Ways and run**  
5 **him over.**  
6 Q. Why?  
7 **A. Because when he turned the corner, he said, "I've got**  
8 **something for you niggers now."**  
9 Q. Okay. He said that twice?  
10 **A. As I recall, he said it once, and that's when I started**  
11 **firing. He said -- over here, he said, "Oh, it's like**  
12 **that. I've got something for you." Then he took off.**  
13 **Then when he came back, he said, "now" or**  
14 **something -- "niggers" or something. I can't recall**  
15 **exactly, but I heard him say that, and I saw the gun and**  
16 **him going at Ways. That's the only reason why I fired.**  
17 Q. Well, "going at Ways." What do you mean "going at  
18 Ways"?  
19 **A. With the vehicle at a high rate of speed.**  
20 Q. Okay. Having just turned a corner?  
21 **A. With a gun in his hand.**  
22 Q. Uh-huh.  
23 And so he's raising the gun to shoot him and run  
24 him over, according to you?  
25 **A. Ma'am, it happened so quick, I thought he was going to**

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1 **shoot at him or run him over.**  
2 Q. Okay. Do you remember saying that you shot while he was  
3 going southbound down Mendota?  
4 **A. I started shooting, ma'am, as he was bending the**  
5 **corner --**  
6 Q. Okay.  
7 **A. -- on Mendota.**  
8 Q. And do you remember previously saying that he was  
9 driving southbound when you shot?  
10 **A. I said I observed him coming southbound. It's confusing**  
11 **the way that I say when I started shooting because he**  
12 **was coming southbound when I could see it. When he was**  
13 **turning on Curtis, you could still see it, and that's**  
14 **when I started shooting. As far as -- as to what angle**  
15 **I was at, I know my rounds went towards Mendota and**  
16 **towards this other street over here.**  
17 Q. Are you standing -- you're standing kind of in the  
18 street?  
19 **A. I moved over to the west side of the street when I heard**  
20 **the car coming.**  
21 Q. You moved --  
22 **A. I didn't know who was in the car until I saw him.**  
23 Q. You moved to the west side of Mendota?  
24 **A. No. Of Curtis. I stayed on Curtis.**  
25 Q. Okay. You mean the westbound part?

<p>Page 101</p> <p>1 A. Yes.</p> <p>2 Q. Because it's -- okay. But you got yourself at "X4" at</p> <p>3 the time of the shooting; right? That's where you were</p> <p>4 when you shot?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. All right. I just want to make sure I'm</p> <p>7 understanding it because -- okay.</p> <p>8 But -- so, you don't recall -- do you recall saying</p> <p>9 previously that you shot when he was driving southbound;</p> <p>10 that you -- either you do or you don't. It's --</p> <p>11 A. I don't recall. Because, like I said, he was coming</p> <p>12 down there so fast and as he was turning.</p> <p>13 MS. PRESCOTT: Okay. So, let's just go on to the</p> <p>14 other record for a second, and just give me a second.</p> <p>15 (Audio recording testimony from page 102</p> <p>16 excerpted and bound under separate cover.)</p> <p>17 *</p> <p>18 *</p> <p>19 *</p> <p>20 *</p> <p>21 *</p> <p>22 *</p> <p>23 *</p> <p>24 *</p> <p>25 *</p>	<p>Page 104</p> <p>1 it up across himself?</p> <p>2 A. No, ma'am. He was coming southbound when I saw him.</p> <p>3 When he turned, he basically turned in front of me and</p> <p>4 was going directly --</p> <p>5 Q. And you started shooting?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. So, let's just keep reading.</p> <p>8 "I then feared for the life and safety of</p> <p>9 Officer Ways and was forced to fire my</p> <p>10 department-issued weapon --"</p> <p>11 and you give the make and model --</p> <p>12 "-- several times at the unknown black</p> <p>13 male because I feared he was going to shoot</p> <p>14 Officer Ways or run him over with the car.</p> <p>15 I then observed Officer Ways jump out of</p> <p>16 the way and fell on the south side of the</p> <p>17 street."</p> <p>18 So, Ways falls on the southern half of Curtis?</p> <p>19 A. I can't recall what side he fell on.</p> <p>20 Q. Okay. So, you said here "the south side."</p> <p>21 Do you think --</p> <p>22 A. Then if it was the south side, then it was the south</p> <p>23 side.</p> <p>24 Q. Well, is it or isn't it?</p> <p>25 A. I can't recall, ma'am. If I put that in my report, then</p>
<p>Page 103</p> <p>1 (Non-excerpted testimony resumes.)</p> <p>2 BY MS. PRESCOTT:</p> <p>3 Q. Okay. Are you saying he went southbound down another</p> <p>4 street there?</p> <p>5 A. Yeah. That's what I just said.</p> <p>6 Q. Okay. Then let's look at your report.</p> <p>7 You've got a copy there.</p> <p>8 THE REPORTER: Are we still on the separate record?</p> <p>9 MS. PRESCOTT: No. We can go back.</p> <p>10 BY MS. PRESCOTT:</p> <p>11 Q. Okay. So, I'll just read this, and we can go on from</p> <p>12 there.</p> <p>13 So, you lost sight of him.</p> <p>14 "I then heard a car's tires squealing, and I</p> <p>15 observed the unknown black male driving a</p> <p>16 light-colored Cadillac, traveling southbound on</p> <p>17 Mendota at a very high rate of speed. I then</p> <p>18 observed that the unknown black male had a pistol</p> <p>19 in his hand and yelled through the open window,</p> <p>20 'What's up now, niggers?' He then drove the</p> <p>21 Cadillac directly at Officer Ways and raised up</p> <p>22 the pistol as if he was going to shoot at Officer</p> <p>23 Ways."</p> <p>24 So, I'm going to just pause right there.</p> <p>25 So, this is still south on Mendota? He's raising</p>	<p>Page 105</p> <p>1 that's what I said.</p> <p>2 Q. That's what you said.</p> <p>3 A. Okay.</p> <p>4 Q. Do you have any different information here today?</p> <p>5 A. No.</p> <p>6 Q. Okay.</p> <p>7 "The unknown black male then drove</p> <p>8 eastbound on Curtis and then in an unknown</p> <p>9 direction."</p> <p>10 So, why are you -- so, you see how you said --</p> <p>11 A. Right.</p> <p>12 Q. -- that after you shot him, after Ways shot -- jumped</p> <p>13 out of the way, "then the unknown male then drove</p> <p>14 eastbound on Curtis?"</p> <p>15 A. That's going eastbound.</p> <p>16 Q. Okay. So, he -- you shot and then he was going -- after</p> <p>17 that, he started going eastbound?</p> <p>18 I'm on your report, and I'm trying to understand --</p> <p>19 A. And I understand what you're saying.</p> <p>20 Q. -- your report compared to what you're testifying.</p> <p>21 MR. PADDISON: I think --</p> <p>22 A. Huh?</p> <p>23 MR. PADDISON: Go ahead.</p> <p>24 A. I understand what you're saying.</p> <p>25 I said I shot -- he started going eastbound.</p>

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1 That's when Ways got out of the way. Then he went in an  
2 unknown direction. I don't recall if it was the street  
3 Birwood or it's another street which would be  
4 southbound.  
5 **BY MS. PRESCOTT:**  
6 Q. Okay. What I'm asking you here is, on the night in  
7 question, you said you shot, Ways jumped, "the unknown  
8 black male then drove eastbound on Curtis."  
9 Are you here today to say that he already started  
10 driving eastbound on Curtis before --  
11 **A. It was simultaneous, at the same time. It happened as**  
12 **he was turning.**  
13 Q. All right. And then in this report you say then he  
14 drove off in an "unknown direction."  
15 You do not say he goes south.  
16 Where did south come from?  
17 **A. I told the supervisors that the vehicle went southbound**  
18 **where I was standing at. I couldn't tell -- I don't**  
19 **even know what street this is until you put this on**  
20 **here. You put this as a different street.**  
21 Q. Birwood.  
22 **A. I wouldn't be able to tell you that. That's not my**  
23 **neighborhood.**  
24 Q. Okay. I didn't ask about Birwood. My question is, is  
25 that here today --

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1 **A. He went south. When I said "southbound," I remember him**  
2 **turning right which is southbound, which to me is an**  
3 **unknown direction because I don't know what street he**  
4 **was on or where else he could have turned from there.**  
5 Q. Okay.  
6 **A. Other than that, we would have called that out on --**  
7 Q. Okay. So you are how far away from Ways when you --  
8 when you start shooting? How far is "X5" from "X4"  
9 about?  
10 **A. It's 10 feet, approximately. I'm not sure. Maybe a**  
11 **little bit further.**  
12 Q. Okay. Ways testifies that he chased Parker up Mendota.  
13 Is that true?  
14 **A. I don't recall him chasing anybody. I just saw one**  
15 **person run off, and that was later found out to be**  
16 **Parker.**  
17 Q. Okay. So, you're just not sure?  
18 **A. I don't recall that, ma'am.**  
19 Q. Okay. If he testified that that's what happened, do you  
20 think that that's probably what happened, or you think  
21 that's wrong?  
22 **A. I couldn't answer on what he said.**  
23 Q. That's what I'm trying to get at, your -- how closely  
24 you remember it. But it sounds like you don't know?  
25 **A. No. I said "approximately."**

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1 Q. Okay. And --  
2 **A. I was close enough to see a gun and close enough to see**  
3 **him getting ready to run Ways over.**  
4 Q. Well -- and you must have been really close because he  
5 was turning the corner right tight to you; right?  
6 **A. Yes.**  
7 Q. Okay. And so --  
8 **A. He didn't look in my direction. He was looking at Ways.**  
9 Q. Okay.  
10 **A. That's why I said it startled him.**  
11 Q. So, why -- are you trying to shoot him where? You're  
12 trained to shoot people when you're going to shoot them  
13 where? In the leg? In the chest? You're trained to  
14 shoot them in the body; right?  
15 **A. You're trained to shoot, yes, ma'am.**  
16 Q. Biggest target; right?  
17 **A. Yes.**  
18 Q. And so how far away from Parker's car are you when you  
19 shoot?  
20 **A. I couldn't tell you exactly that.**  
21 Q. It couldn't have been more than a few feet, right, based  
22 on what you've drawn?  
23 **A. Approximately about 10 feet or less.**  
24 Q. Okay. And so you were -- this is your duty weapon?  
25 **A. Yes.**

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1 Q. And your duty outfit; right?  
2 **A. Yes.**  
3 Q. And you're stepping in at this point because you're  
4 going to, according to you, protect Ways' life?  
5 **A. Yes.**  
6 Q. Okay. And so that's an official police action; right?  
7 You've intervened in the situation; right?  
8 **A. Yes.**  
9 Q. And do you ever say to him, "Stop. Police"?  
10 **A. It happened so quick, ma'am, I didn't have time.**  
11 Q. Well, you had time to hear him say -- what did he say?  
12 **A. Something. "What's up now?" whatever.**  
13 Q. "What's up now?"  
14 **A. Because he had his window down.**  
15 Q. Uh-huh. So, you see him --  
16 **A. I was close enough to hear his tires squealing for him**  
17 **to drive right past me. For some reason he didn't see**  
18 **me until he started -- when I started firing.**  
19 Q. Do you start raising your gun as you see him coming down  
20 the street at you?  
21 **A. I had my gun ready, ready position, like I'm trained.**  
22 Q. I mean, like is it -- is it like at shooting, you  
23 know --  
24 **A. No. It was in ready position like I'm trained through**  
25 **DPD.**

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1 Q. Okay. So, you had time to raise your weapon to shoot,  
2 but not time enough to say, "Stop. Police"?  
3 **A. It happened so fast.**  
4 **Yes, ma'am.**  
5 Q. Okay. And from the time you're there to the time you  
6 shoot 16 times is how long?  
7 **A. It happened within seconds.**  
8 Q. From the time you arrived until then?  
9 **A. Yes.**  
10 Q. Okay. And other -- your co-defendants have said that  
11 you-all were there for 10 minutes.  
12 Do you remember -- does that sound right?  
13 **A. It seemed for me, things happened fast. As soon as I**  
14 **got there --**  
15 Q. Well, it's just one amount of time. I mean, time is  
16 time.  
17 **MR. PADDISON:** To clarify, it mischaracterizes the  
18 testimony. I don't think anybody gave an exact  
19 10-minute time frame.  
20 **MS. PRESCOTT:** Okay. Well, we can pull it out.  
21 **BY MS. PRESCOTT:**  
22 Q. Go ahead.  
23 You think you were there just a matter of a few  
24 seconds before you shoot?  
25 **A. I didn't say a few seconds.**

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1 Q. Okay. Well, do you know?  
2 **A. We were there for a short period of time, ma'am.**  
3 Q. And you -- as far as you know, it might have been  
4 10 minutes or it might have been a few seconds? You  
5 don't know?  
6 **A. It might have been 10 minutes, or it might have been**  
7 **less.**  
8 Q. Okay. And so that's what I'm missing, is if it's  
9 10 minutes, I don't understand what's going on in that  
10 10 minutes.  
11 Because you -- you know, you get out of the car.  
12 Ways walks down. Someone runs away. Car comes down.  
13 You shoot.  
14 So, what is in the rest of that time?  
15 **A. I said when we pulled up, they were in the street**  
16 **squared off, arguing. I couldn't hear what they were**  
17 **saying. Ways started walking down there.**  
18 Q. Yeah.  
19 **A. The next thing you know, once he saw Ways -- I'm**  
20 **assuming he saw Ways, and that's when he made the**  
21 **statement and ran off. Again, like I said, I don't know**  
22 **if he went to a house or between houses because it was**  
23 **dark.**  
24 Q. Right.  
25 **A. And the next thing you know, I started yelling for Ways**

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1 **to come on. I could hear Townson telling his son, "Come**  
2 **on. Let's go."**  
3 **Next thing you know, all hell breaks loose when the**  
4 **car comes flying down the street --**  
5 Q. Right.  
6 **A. -- with the window down, with him, with a gun in his**  
7 **right hand, and he's turned to go on Curtis, and he was**  
8 **going directly at Ways.**  
9 Q. Okay. And what you -- what I think you've said is, in  
10 the time it took Ways to go half a block -- because  
11 you've drawn him in --  
12 **A. I didn't say half a block now. I told you earlier, I**  
13 **don't know how many houses that was from Mendota. I**  
14 **mentioned that.**  
15 Q. Well, I know -- we aren't -- I'm not on houses. I  
16 didn't say anything about houses. You've drawn him  
17 going about half a block -- halfway down the street and  
18 coming back. And in that amount of time, Parker is  
19 back; right?  
20 **A. Yes.**  
21 Q. Okay. Isn't it true that you were disciplined relative  
22 to this situation?  
23 **A. They gave me a -- I don't know what you call that -- a**  
24 **verbal talk about the extra round thing. I told them**  
25 **why my gun was able to do that.**

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1 **THE REPORTER:** Excuse me? "-- told them --"  
2 **A. Why my gun was able to -- they changed some rule why I**  
3 **was able to hold that many rounds in there. Because it**  
4 **was the first generation.**  
5 **BY MS. PRESCOTT:**  
6 Q. Okay. Is it -- did you get disciplined about this  
7 situation or not?  
8 **A. No. It was just a verbal counseling with my big boss,**  
9 **my commander.**  
10 Q. Okay. So, let's understand.  
11 I would like to know about all discipline you  
12 received, whether it's a verbal counseling or other  
13 counselings.  
14 **A. Okay.**  
15 Q. And earlier we talked about two times you said you had  
16 been disciplined. You did not mention this, so I want  
17 to go back.  
18 **A. If you would call that discipline. All they did was**  
19 **talk to me about it, and that was it. I didn't lose any**  
20 **days, no ACR entry, nothing. It was just verbal.**  
21 Q. Who talked to you about it?  
22 **A. Commander Kyriacou.**  
23 **THE REPORTER:** I'm sorry?  
24 **A. Kyriacou.**  
25 **Good luck on the spelling.**

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1 **BY MS. PRESCOTT:**  
2 Q. Okay. It was a commander?  
3 A. Yes.  
4 Q. And what did you -- what were you supposed to have done  
5 wrong?  
6 Like what did they say was wrong?  
7 A. He said why did I have 16 rounds in my magazine.  
8 Q. Okay. Was that something that was considered wrong to  
9 do, to have 15 or 16 or whatever?  
10 A. Not to me because as if he knew and understood it, if  
11 you know anything about weapons, I had the first  
12 generation, and they said if you have to force in 15  
13 rounds, not to. So, just have 14 in the mag so you can  
14 keep the spring still fresh, and then put one in the  
15 pipe so you'll have 15 rounds.  
16 My gun was one of the first generations where I  
17 could put in 15 rounds in the mag without forcing it and  
18 then put one in the chamber so it equalled 16 rounds.  
19 Q. Okay. So, did you get a verbal warning?  
20 A. Yes.  
21 Q. Okay. Why? Because they don't understand guns and  
22 yours was really a first generation and it was okay and  
23 it shouldn't have happened or what?  
24 A. I explained to him why, and he explained to me the new  
25 policy, how it's changed, and I said, "Okay." I said,

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1 "It won't happen again."  
2 Q. Okay. At any point do you get any kind of discipline or  
3 criticism, commentary of negative feedback about having  
4 shot Demar Parker?  
5 A. No.  
6 Q. Or -- you know, putting 16 bullets into a, you know,  
7 residential neighborhood in --  
8 A. No.  
9 Q. -- middle of the evening?  
10 Does anyone ever come back to you and say, "Boy,  
11 gee, nobody else saw a gun that night. What do you make  
12 of that? No one ever --"  
13 A. I know what I saw.  
14 Q. But no one ever comes back to you and says, "Nobody else  
15 saw a gun that night"?  
16 A. I know what I saw, ma'am. I can only go by what I saw.  
17 Q. My question isn't about what you saw. My question is  
18 about what the department asked you.  
19 Did the department ask you any questions about how  
20 your story was different from anybody else's?  
21 A. No.  
22 MR. PADDISON: Objection. Mischaracterizes  
23 testimony.  
24 BY MS. PRESCOTT:  
25 Q. Okay. For example, no one ever came back to you and

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1 said, "Well, your partner says you met at the Northwest  
2 Activity Center, and you say that didn't happen."  
3 They didn't confront you with that and say, "What's  
4 the truth?"  
5 Right?  
6 A. No.  
7 Q. And nobody ever comes to you and says, "Your partner  
8 says that I had to jump out of the way, and there was a  
9 swerving and I was being swerved at, and then there was  
10 shooting"?  
11 No one ever comes and says that to you, do they?  
12 A. No.  
13 Q. And nobody ever says, as far as you know, "Hey, do you  
14 think maybe it was dangerous to shoot at a person,  
15 causing them to swerve, when somebody else is standing  
16 in the street?"  
17 Right? No one ever says that?  
18 A. They asked me what was the -- what direction I fired and  
19 what was the backdrop behind there, and I told them the  
20 telephone pole and the grass because it was in a  
21 downward direction.  
22 Q. Okay. And nobody ever says to you that, you know,  
23 "Everybody else says this about the way he's driving,  
24 and you say that about the way he's driving, west,  
25 east?"

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1 No one ever comes back to you and tries to put the  
2 stories together; right?  
3 A. No.  
4 Q. And no one ever suggests to you that, you know, "Some of  
5 the stories don't line up in any way," do they?  
6 A. No.  
7 Q. And nobody ever gives you any discipline for any --  
8 anything to do with your reporting of this incident,  
9 whether it was truthful or not?  
10 A. No.  
11 Q. And during the investigation -- as we've already  
12 covered, right -- nobody ever says to you, you know,  
13 "Officer, there's been a lot of people that have been,  
14 you know, shot while you have been an officer. We want  
15 to go over, you know, situation by situation," like we  
16 did here today; right?  
17 A. I only talk to my therapist about that.  
18 Q. There's no training that you've gotten after the  
19 incident with Parker because of the incident with  
20 Parker; right?  
21 A. What do you mean "training"?  
22 Q. Well, like nobody ever said, "Blanding, you've got to go  
23 to extra training."  
24 A. No.  
25 Q. Or you need to be pulled out to a particular program or

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1 intervention of any kind; right?  
2 **A. No.**  
3 **(Deposition Exhibit 2 marked**  
4 **for identification.)**  
5 **BY MS. PRESCOTT:**  
6 Q. And is this your signature here on the back of these  
7 Interrogatories I'm marking as Exhibit 2?  
8 **A. Yes.**  
9 Q. Okay. There was a set of questions and answers you had  
10 to go through with your lawyer.  
11 Do you remember that?  
12 **A. I'm sure I did, but I don't remember.**  
13 Q. Okay. And that's what you were signing was, you know,  
14 the set of questions and answers.  
15 I asked about disciplinary history, and the answer  
16 came back that you've gotten two written reprimands on  
17 two prior occasions. The first was related to a failure  
18 to follow an administrative policy regarding department  
19 paperwork.  
20 Is that the report we talked about with the box?  
21 **A. Yes.**  
22 Q. The second being related to discharge of a firearm  
23 with -- something about wildlife in an abandoned  
24 location.  
25 That's the other one?

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1 **A. Yes.**  
2 Q. Okay. Do you know why this doesn't also list that you  
3 were given verbal counseling about the incident of Demar  
4 Parker?  
5 **A. I have no idea, ma'am.**  
6 Q. You were acting in -- as a police officer when you shoot  
7 my client, according to what you said earlier; right?  
8 **A. Yes. Saving Officer Ways' life.**  
9 Q. Okay. An interrogatory I asked -- a question I asked  
10 said:  
11 "Were you acting in the course and scope  
12 of your police duties? Please explain."  
13 And the answer I got back was:  
14 "No. Defendant was off duty at the time  
15 of the incident. Defendant was with his friend,  
16 Defendant Ways."  
17 It explains about Ways getting the call, and it  
18 goes on to say:  
19 "Defendant --"  
20 meaning you --  
21 "-- was armed with his service weapon but  
22 did not identify himself as a police officer  
23 and did not threaten to arrest Plaintiff or  
24 issue Plaintiff a citation. Defendant did not  
25 act as a police officer, but was simply trying

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1 to help a friend."  
2 Why did you answer it that way?  
3 **A. Because that's what I did.**  
4 Q. Okay.  
5 **A. Once I started firing my weapon, then you**  
6 **automatically -- you're going into police mode.**  
7 Q. Okay.  
8 **A. I could have easily left the location. He would have**  
9 **never known who I was. I didn't. We stayed there. I**  
10 **did proper notifications and waited.**  
11 Q. Okay.  
12 **A. I could have easily left. He would have never known who**  
13 **I was.**  
14 Q. Okay. You could have shot someone and then just walked  
15 away from the situation?  
16 **A. That happens all the time in the city. I could have --**  
17 Q. Okay. But that's not legal; right?  
18 **A. No, it's not legal. I did the right legal thing within**  
19 **the line of duty.**  
20 Q. Okay. And so you weren't just there to help a friend at  
21 the time that you shoot my client; right?  
22 **A. Of course I was there to help my friend.**  
23 Q. Right.  
24 But at the time you shoot my client, you're acting  
25 now -- you understand you're a police officer?

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1 **A. It turns to another police action, yes.**  
2 Q. Right.  
3 Okay. And yet -- but it is true you don't identify  
4 yourself, say -- we talked about this -- "Stop.  
5 Police"; right?  
6 **A. I didn't have time, ma'am.**  
7 Q. And you don't threaten to arrest Plaintiff while -- do  
8 you remember anything you said to my client?  
9 **A. I didn't have time, ma'am.**  
10 Q. Okay. All right. And so you don't see Sanchez that  
11 night, the lady at the house?  
12 **A. Never saw her.**  
13 Q. You're not the one who called 911?  
14 **A. No. I told Townson to call.**  
15 Q. Okay. Did you have a dispute with a supervisor that --  
16 and not call him out for that reason that night?  
17 **A. Yes. I had a dispute with a supervisor.**  
18 Q. Okay. What was it about?  
19 **A. Because he tried to disarm me while I was still in**  
20 **danger at a scene where a suspect that I just shot at**  
21 **had left.**  
22 **And they said it was improper for him to try to do**  
23 **that. I have more time than him on the job, and I**  
24 **knew -- I said, "If you're ready to go down and me make**  
25 **statements, let's go. We don't know where this guy**

<p>Page 122</p> <p>1 went. I don't know who he's with. He already came back  2 one time. You're not going to put me in harm's danger  3 like that."  4 And other supervisors, including his commander, got  5 on him and said that I was correct.  6 Q. Okay. So, you were asked to turn over your weapon --  7 A. At the scene.  8 Q. -- by your supervisor?  9 A. No, not my supervisor. It was another supervisor.  10 Q. Okay. And you said, "No, because I might get shot or  11 hurt"?  12 A. No. I said, "If you're ready to go --" which he  13 apparently didn't understand the proper procedure. I  14 said, "If you're ready to go, fine."  15 But he said, "No. Hand me your weapon."  16 And he was basically going to have me standing out  17 there while we did not know where he was going, what  18 else he was going to go do.  19 And I said, "I'm not giving you my weapon until I'm  20 in a safe environment."  21 Q. Okay. And so how many officers are on the scene at that  22 point?  23 A. A lot.  24 Q. All right. A lot, a lot; right?  25 A. Uh-huh.</p>	<p>Page 124</p> <p>1 MS. PRESCOTT: Okay. Let's listen to it and we'll  2 just see -- we'll just go onto the other record just to  3 make sure that we've covered what is on here.  4 (Audio recording testimony from page 125  5 excerpted and bound under separate cover.)  6 *  7 *  8 *  9 *  10 *  11 *  12 *  13 *  14 *  15 *  16 *  17 *  18 *  19 *  20 *  21 *  22 *  23 *  24 *  25 *</p>
<p>Page 123</p> <p>1 THE REPORTER: I'm sorry. Is that "yes"?  2 A. A lot.  3 BY MS. PRESCOTT:  4 Q. And where are you standing when you have this  5 confrontation with the supervisor?  6 A. By one of the scout cars.  7 Q. And can you draw --  8 A. I can't remember where, ma'am. They start blocking the  9 streets off and all that stuff.  10 Q. Right.  11 So, you're in between street blockades; right?  12 A. As I recall, yes.  13 Q. Okay. So, who is the supervisor that you have a dispute  14 with?  15 A. I can't think of his name. They all know him. They  16 said he's -- he's a supervisor at Number 12.  17 Q. And you were in the 12th Precinct's area; right?  18 A. Yes.  19 Q. And was he the officer in charge of the scene or what?  20 A. I have no idea. He just pulled up to me, didn't even  21 ask me if I was okay, and said, "Officer, relinquish  22 your weapon."  23 And then that's when we start going back and forth.  24 And I said, "If you're ready to go, then let's go, but  25 I'm still in harm's danger."</p>	<p>Page 126</p> <p>1 (Non-excerpted testimony resumes.)  2 BY MS. PRESCOTT:  3 Q. Okay. So, that's where you say "Him and I got into it."  4 A. Uh-huh.  5 Q. And she goes on to say, "Did you call 911?"  6 At any point does anyone ever say to you, "What do  7 you mean you got into it with a supervisor that night?"  8 A. I meant verbally, ma'am.  9 Q. Well, does anybody else question you from Internal  10 Affairs or beyond this Garrity statement?  11 A. I -- as I recall, Tony O'Rourke had asked me what  12 happened because he saw I was pissed off. The commander  13 had asked me. I can't think of their commander, which  14 would be their 2400 at the time. And then once they  15 understood what was said to me by him, they went and got  16 on him and told me to stand by and wait until they're  17 ready for me to leave.  18 And they -- one of them, as a matter of fact, even  19 apologized for his actions, saying that he was -- the  20 supervisor was wrong.  21 Q. Okay. So, a Detroit police officer on duty asked you  22 off duty to relinquish your weapon after shooting  23 someone --  24 A. Sergeant.  25 Q. A sergeant -- after shooting someone, and you got an</p>

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1 apology for this at the end of this?  
2 **A. No. They said --**  
3 Q. Is that how it went?  
4 **A. It's not exact words.**  
5 Q. Okay.  
6 **A. They said, "Sorry about that. He's an asshole. He**  
7 **doesn't know what he's talking about."**  
8 Q. Okay. And did you give over your weapon that night on  
9 the scene?  
10 **A. Later when they were getting ready to take me.**  
11 Q. Yeah.  
12 And so you did give it over that night?  
13 **A. I gave it to whatever -- the big boss. I still didn't**  
14 **give it to him. I gave it to him, their 2400, and we**  
15 **went back to the station. And I believe I got it**  
16 **back -- yeah, I did get it back that day.**  
17 **I don't know if I got it back that day at the**  
18 **station or Homicide had gave me a loaner.**  
19 Q. Why did you give it over when you gave it over?  
20 **A. Because that's procedure. You're supposed to give it**  
21 **over.**  
22 **That doesn't mean they take it from you, you know.**  
23 **It's evidence then. So, I gave it to the -- well, the**  
24 **commanding officer. We go back to the station, and I**  
25 **can't recall if I had -- I'm almost positive they gave**

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1 **me a loaner, which would have come from homicide.**  
2 Q. Okay. But what I'm asking is, why do you -- you don't  
3 give it to the one guy.  
4 Do you know who you give it to?  
5 **A. I just said their -- whoever was -- I can't think of his**  
6 **name. He was the commanding officer of -- from the west**  
7 **side that day.**  
8 Q. Okay. And when you give it to him, you're still  
9 standing somewhere in the area of Curtis and Mendota;  
10 right?  
11 **A. No. They took me to the station.**  
12 Q. So, you had your gun when you left Curtis and Mendota?  
13 **A. I gave it to a supervisor of the 12th Precinct, which**  
14 **was a commanding officer. I can't remember who took me**  
15 **to Number 10, but that gun was with him.**  
16 **As to when they gave me another loaner gun, I don't**  
17 **know, but I still had another gun on me.**  
18 Q. There's a Sergeant Terechenot, T-e-r-e-c-h-e-n-o-t(sic).  
19 **MR. PADDISON: Terechenok.**  
20 **BY MS. PRESCOTT:**  
21 Q. Terechenok?  
22 **A. That's the guy I got into it with.**  
23 Q. So, according to the Force Investigation report,  
24 Sergeant Terechenok reported he asked Officer Blanding  
25 for his department identification and his firearm.

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1 Officer Blanding surrendered his I.D. but not his  
2 firearm. Captain Szilagy, S-z-i-l-a-g-y, ordered  
3 Officer Blanding to surrender his firearm.  
4 Is that who you think probably --  
5 **A. Terechenok is the sergeant I got into it.**  
6 **None of them ever took my I.D.**  
7 **And then when however you pronounce that**  
8 **commander's name or captain, that's who I gave my weapon**  
9 **to, and then I immediately left.**  
10 Q. So, this doesn't talk about you getting an apology for  
11 being asked to turn over your gun.  
12 **A. No. No. One of my supervisors said, "That's it. Just**  
13 **forget it. Don't worry about. He's an asshole."**  
14 Q. Okay. But actually the captain agreed with the sergeant  
15 that you needed to surrender --  
16 **A. Of course he's going to say he ordered me, and I still**  
17 **didn't give it to him. I gave it to the captain.**  
18 Q. Right. The captain, when he comes, orders you to  
19 surrender the firearm just like the sergeant did.  
20 **A. No. He didn't say that. The sergeant ordered me.**  
21 Q. Okay.  
22 **A. The captain -- once the captain walked up, after my**  
23 **supervisor and him talked to him, he said, "Officer**  
24 **Blanding, you know you're going to have to give up your**  
25 **weapon. You're going to have to leave."**

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1 **I said, "Okay. I'm still not giving it to him,"**  
2 **and I removed my weapon and gave it to the captain.**  
3 Q. Okay. The captain asked you to give him your gun;  
4 right?  
5 **A. Terechenok or whatever is the one that did it. He just**  
6 **walked -- the captain walked up, said, "Officer, you**  
7 **know what you have to do. You have to give up your**  
8 **weapon."**  
9 **I can't remember his exact words, ma'am.**  
10 Q. Is there some reason why you're worried about agreeing  
11 that this is why he ordered you --  
12 **A. I'm not worried about it.**  
13 Q. -- to surrender your firearm?  
14 **A. I'm not worried about it. You're making a bigger deal**  
15 **out of it than it has to be.**  
16 Q. Okay.  
17 **A. I know I gave it to him.**  
18 **I didn't give it to that sergeant.**  
19 Q. Is this report untrue when it says he ordered you to  
20 give him the gun, the captain?  
21 **A. Ma'am --**  
22 Q. That's all I want to know.  
23 **A. Terechenok had ordered me to give it to him.**  
24 Q. Okay. So, is this report untrue when it says that the  
25 sergeant --

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1 A. I can't say that, ma'am.  
2 Q. Okay. You never got close enough to Parker to smell  
3 anything on him, did you?  
4 A. No.  
5 Q. Did you tell anyone that you had been the victim of a  
6 felonious assault that night?  
7 A. The felonious assault would have been on Ways.  
8 Q. Okay. So, you didn't say you had been the victim of a  
9 felonious assault; right?  
10 A. I don't recall that. Ways was the one about to be the  
11 victim if he would have got hit or got shot.  
12 Q. Okay. And so the -- why did no one pursue --  
13 A. I have no idea.  
14 Q. -- Parker?  
15 A. That's -- that's what we wonder.  
16 Q. Well, why didn't you pursue him?  
17 A. How can I pursue him? I'm not investigator. That was  
18 up to them, the Internal Affairs, Force Investigation.  
19 Q. Well, I just mean that night. You can get in the car  
20 and go down the way. I mean, you just riddled the car  
21 with bullets.  
22 A. In my personal car and chase him and have someone else  
23 get killed because you're chasing a guy in your personal  
24 vehicle? That's not smart.  
25 Q. Okay.

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1 A. Our chases don't end well in the city.  
2 Q. Any reason that you don't report that you had had a  
3 problem with the sergeant?  
4 A. My supervisor prepared that. He knew him.  
5 Q. Mr. O'Rourke?  
6 A. Yes. They got on it.  
7 Q. And why is your supervisor out there?  
8 A. Because I called him on his cell phone.  
9 Q. You wanted him to come out there and help sort it out?  
10 A. You always call your immediate supervisor so he doesn't  
11 find things out from other people. And plus he -- I  
12 didn't know those other supervisors or nothing.  
13 Q. What does that matter?  
14 A. Because if you have a crew that's working for you, you  
15 want them to tell you, "Hey, I just got in trouble with  
16 them," or "something happened," or "just got in a  
17 shooting," "just got in a car accident," as opposed to  
18 them coming to work the next day and finding out from  
19 the supervisor. You don't do that.  
20 Q. Okay. But why does he have to come out to the site?  
21 A. Because I just was involved in a shooting.  
22 Q. How long have you gone by the handle of "Fatal Force"?  
23 MR. PADDISON: Objection. Relevance.  
24 A. Do I have to answer?  
25 MR. PADDISON: Yeah, you can answer.

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1 A. That has --  
2 BY MS. PRESCOTT:  
3 Q. My question is a how long question.  
4 How long? Years? Months?  
5 A. That's a martial arts term.  
6 Q. Okay. How long have you used the term "Fatal Force" as  
7 your --  
8 A. I couldn't give you a date.  
9 Q. No one at DPD ever asks you about that?  
10 A. No. They got that off my Instagram thing when I talked  
11 to other martial artists. They falsified that whole  
12 report. I had just opened up a Facebook, which I  
13 probably never used. The "Fatal Force" is an Instagram  
14 thing which, if it was still open, you could see all I  
15 talked to is other martial artists.  
16 Q. Who falsified what report?  
17 A. Whoever at Metro Times and whatever you reported to  
18 people about me, making it sound like I'm just this  
19 rogue cop out here shooting people.  
20 Q. Okay. So, let's get specific about what we have here.  
21 (Deposition Exhibit 3 marked  
22 for identification.)  
23 BY MS. PRESCOTT:  
24 Q. So, this is you; right? Exhibit 3, "Fatal Force"?  
25 A. That's from my Instagram.

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1 Q. Right.  
2 And nobody at DPD ever goes on your Instagram and  
3 sees if you were holding yourself out as "Fatal Force";  
4 right?  
5 A. As far as investigation, no.  
6 Q. What -- what martial art are you referring to?  
7 A. Something I've been doing since I was a kid.  
8 Why does that matter?  
9 Q. Is it Taekwondo or --  
10 A. No.  
11 Q. What is it?  
12 A. Japanese Shotokan karate.  
13 THE REPORTER: I'm sorry. "Japanese --"  
14 A. Japanese Shotokan karate.  
15 BY MS. PRESCOTT:  
16 Q. And it's -- and there is some -- is it your position  
17 that this form of martial arts is -- endorses fatal --  
18 the use of fatal force?  
19 A. I don't know how to properly answer that.  
20 Q. Did you know Crenshaw before the shooting?  
21 A. Who?  
22 Q. Crenshaw, the guy you shot. Johnny Crenshaw.  
23 A. Never.  
24 Q. Khary Mason, do you know him?  
25 A. Khary Mason?

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1 Q. Khary Mason.  
2 A. **Yes.**  
3 Q. How do you know him?  
4 A. **We used to work together. He's at Homicide.**  
5 Q. How long -- how many -- how long did you know him?  
6 A. **We worked at ATF task force together --**  
7 **THE REPORTER:** I'm sorry. "-- worked at --"  
8 A. **ATF task force together. And then I transferred over to**  
9 **Number 10 probably in 2010, and he was my regular**  
10 **partner until he left and went to Homicide.**  
11 **BY MS. PRESCOTT:**  
12 Q. Okay. How long was that that you would have been  
13 regular partners?  
14 A. **I couldn't tell you. Maybe two, three years.**  
15 Q. Okay. And you two were also friends; right?  
16 A. **Yes.**  
17 Q. Outside of work?  
18 A. **Yes.**  
19 Q. And considered him a close friend; right?  
20 A. **Yes.**  
21 Q. And the ATF task force when you first started working  
22 with him, what year would that have put us in?  
23 A. **I was at two task forces in 2006. I was at ATF task**  
24 **force and DEA task force.**  
25 Q. Okay. So, you would go back with him about ten years,

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1 then?  
2 A. **I couldn't say that because I was at ATF task force**  
3 **before him.**  
4 Q. He was one of the people that was investigating for  
5 Homicide in the -- with regard to the shooting of  
6 Parker; right?  
7 A. **Yeah.**  
8 **But he couldn't say anything about it.**  
9 Q. Couldn't say anything about the fact that you had been  
10 friends for ten years?  
11 A. **I mean, I'm sure he can, but as far as giving me details**  
12 **and stuff, he doesn't do that.**  
13 Q. Uh-huh.  
14 What about the other guy who investigated for  
15 Homicide? What was his name?  
16 A. **Who?**  
17 Q. There's no one else you know that was an investigator?  
18 A. **They have a --**  
19 Q. A task force?  
20 A. **-- a shooting team or whatnot.**  
21 **Yeah. So, I don't know who was all on it. I know**  
22 **just about everybody on the department. I've been on**  
23 **the job so long. But as far as the Homicide having**  
24 **their own, I guess it's a shooting team or a team that**  
25 **deals with police shootings, enforcement. It's a**

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1 **different little group.**  
2 Q. Do you ever talk to Mason about the situation with  
3 Parker?  
4 A. **No, we couldn't.**  
5 Q. I mean, he never questions you?  
6 A. **No.**  
7 Q. And you --  
8 A. **Oh.**  
9 Q. Go ahead.  
10 A. **I guess one time, I was down there at Homicide, taking**  
11 **another suspect down there. And I guess they brought**  
12 **Parker in for questioning.**  
13 Q. Actually, he decided to come in voluntarily.  
14 But go ahead.  
15 A. **Okay. Well --**  
16 Q. But he's there. You see him?  
17 A. **But he still didn't know who I was.**  
18 **So, they just made sure that I walked around the**  
19 **hallway. My deal with my prisoner, that had nothing to**  
20 **do with that. And then I -- that was it.**  
21 Q. Okay.  
22 A. **And he walked right past me. I didn't know that he**  
23 **still didn't know who I was.**  
24 Q. So, Mason talked to you about that at that point; is  
25 that --

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1 A. **No, they saw --**  
2 Q. The question had been -- and just to help you --  
3 A. **I just so happened to be at Homicide, with a homicide**  
4 **suspect.**  
5 Q. I'm with you.  
6 A. **As I was standing at their witness room, they came in or**  
7 **whatever you want to say -- he came in or whatever with**  
8 **Parker.**  
9 **I knew who he was, but he didn't know who I was.**  
10 Q. And how did you know who he was?  
11 A. **I just -- I don't forget a face, ma'am. I knew he**  
12 **looked familiar, and then the way that they looked, and**  
13 **they were like, oh, can't have you two together.**  
14 **And I was like -- you know, I said, "Okay."**  
15 **And then the guy walked past, and I said, "He**  
16 **already walked past me."**  
17 **And he was like, "Did he say anything to you?"**  
18 **I said, "He doesn't know who I am."**  
19 **And, see, I want to share something with you.**  
20 **This is how they switched it up. That's the**  
21 **picture of when I was in the Bahamas. This is something**  
22 **from Facebook, how they switched it up. This is a**  
23 **picture of me from in the Bahamas, sitting there**  
24 **smiling, and they switched this up to make this look**  
25 **like this is my Instagram photo, and it's not.**

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1 So, like I said, they're trying to make me look  
2 like some rogue cop.  
3 BY MS. PRESCOTT:  
4 Q. Is that not a picture of you?  
5 A. It's two pictures, if you look at it closely.  
6 One is -- at the top which says, "Fatal Force,"  
7 which is my Instagram. It's when I was down in the  
8 Bahamas with my wife.  
9 Q. Okay.  
10 A. That picture of me with the weights, that's from my --  
11 someone set that up on my Facebook. So, they switched  
12 it around and tried to make me look like I'm some damn  
13 killer.  
14 Q. Okay. But -- so, this is a picture of you and your  
15 weights -- with your weights; right?  
16 A. Yes.  
17 Q. The picture is you, and the "Fatal Force" is your  
18 handle?  
19 MR. PADDISON: Go ahead and answer.  
20 A. Yes.  
21 BY MS. PRESCOTT:  
22 Q. We got -- okay. All right. I don't know what -- is  
23 this something different?  
24 A. It's the image that they're trying to make me look like.  
25 That's from Facebook, which I never use.

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1 (Deposition Exhibit 4 marked  
2 for identification.)  
3 BY MS. PRESCOTT:  
4 Q. Okay. Is this Exhibit 4 a picture where you have the  
5 boxing gloves on and the whatever?  
6 A. You don't see boxing gloves. That's weights.  
7 Q. Okay. What is --  
8 A. And at the top, as a matter of fact --  
9 Q. Oh, I see. Yeah, you're right. That's weights behind  
10 it. Okay.  
11 A. Which that's what -- I didn't like how they tried to  
12 switch it.  
13 MR. PADDISON: Well, no. We'll get to that.  
14 MS. PRESCOTT: Okay.  
15 A. Okay.  
16 MS. PRESCOTT: You can get to it. I really don't  
17 care --  
18 A. Well, it's a big deal to me because it's -- it's  
19 jeopardizing my career.  
20 BY MS. PRESCOTT:  
21 Q. Okay. Well, let's get -- let's get something clear.  
22 The picture of you with the weights is a picture you've  
23 used as your -- is it a picture you have used as your  
24 identifying picture, your -- I don't have the right  
25 word.

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1 A. On Facebook, which someone posted for me.  
2 Q. Okay. But you used -- this is the picture that you  
3 uploaded on Exhibit 4; right?  
4 A. Yes. Someone else did it for me.  
5 Q. Okay. And then separately your Instagram handle is the  
6 "Fatal Force"; right?  
7 A. Yes.  
8 Q. Okay. And so you think someone is trying to smear you  
9 as a bad cop because why?  
10 A. Between you and the people from Metro Times, yes.  
11 Q. No, no, no.  
12 What is --  
13 A. Because why would they switch --  
14 Q. -- being done that's unfair?  
15 A. Why would they switch -- why would they switch those  
16 pictures around and try to make me sound like I'm some  
17 rogue cop and just like --  
18 Q. What is unfair about what's on Exhibit 3 or 4?  
19 A. How they switched those pictures around.  
20 Q. Okay. Show me.  
21 A. That "Fatal Force" is not the "Fatal Force" picture that  
22 I put out there on the Internet. It was a picture of me  
23 sitting up smiling in the Bahamas. I'm saying they're  
24 trying to make me look like I'm just this evil person.  
25 They put that all in the paper, in the Metro Times.

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1 That's the only reason why he knew who I was.  
2 Q. Okay.  
3 A. Now he confronted me at the school. That's what I'm  
4 saying.  
5 You know, so, whatever. People do anything to get  
6 money, I guess, but that's slander.  
7 Q. Okay. And nobody did anything to get money that made  
8 you put yourself out there as "Mr. Fatal Force," did  
9 they? You chose to do that?  
10 A. It's a martial arts term, ma'am.  
11 Q. You chose to do that; right?  
12 A. Yes.  
13 Q. Okay. And what is that -- what are we supposed to take  
14 from that? That's --  
15 A. To be honest with you, not switch the pictures around.  
16 Q. What are we supposed to understand about you when you  
17 are "Mr. Fatal Force"? That's who you are to  
18 Instagram --  
19 A. But why would you put a picture --  
20 THE REPORTER: I'm sorry.  
21 BY MS. PRESCOTT:  
22 Q. My question is --  
23 MR. PADDISON: Go ahead and answer her question;  
24 okay?  
25 A. Okay.

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1 **BY MS. PRESCOTT:**  
2 Q. Put Exhibit 3 out of your head. Let's say that we never  
3 saw Exhibit 3.  
4 We know you're "Mr. Fatal Force." That's your  
5 name.  
6 What are we supposed to understand about the use of  
7 "Fatal Force" or your interaction with that concept?  
8 **A. I have no idea.**  
9 Q. You just -- it just happened to be your name you picked?  
10 **A. Yes.**  
11 Q. Okay. You can't think of any reason why?  
12 **A. No.**  
13 Q. Do you remember telling the officers that -- in the  
14 investigation that you stayed by the truck the whole  
15 time and didn't cross the street?  
16 **A. I remember saying "I stayed close to the truck."**  
17 Q. You don't remember saying you stood by the truck the  
18 whole time, twice?  
19 **A. I could have.**  
20 Q. Do you know why you would have?  
21 **A. Because the truck was still in close distance to me from**  
22 **the whole time -- the whole incident.**  
23 Q. Well, do you know why you would have said you didn't  
24 cross the street?  
25 **A. I can't recall, ma'am.**

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1 **As far as staying by the truck, never walking down**  
2 **where Ways went, never getting down where Townson and**  
3 **Parker went, no, I never did. I was still by the truck.**  
4 Q. What kind of gun was he holding? Parker?  
5 **A. All I can say is, it was a dark semi-automatic.**  
6 Q. Do you have any idea why Ways would say he couldn't see  
7 any gun?  
8 **MR. PADDISON:** Calls for speculation.  
9 **BY MS. PRESCOTT:**  
10 Q. That he -- it was impossible to see because it was dark?  
11 **A. Possibly because it was dark; possibly because he saw a**  
12 **car coming at him with headlights on. I have no idea**  
13 **why he couldn't see --**  
14 Q. Uh-huh. Well, you saw a car coming at you with  
15 headlights on; right? The headlights were on; right?  
16 **A. Yes, ma'am.**  
17 Q. Okay. Did anyone ever go through your training history  
18 relative to this investigation with Parker? Like IA or  
19 the people who were doing the Garrity questioning?  
20 **A. I have no idea. They have to go through MAS, which is**  
21 **our training thing, and I'm a certified instructor in**  
22 **several areas for the Detroit Police Department.**  
23 Q. Okay. And so you are somebody who has -- your MAS file  
24 says you've been to training on use of force; right?  
25 **A. Yes. I assist with the defensive tactics courses when**

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1 **they have it.**  
2 Q. Okay.  
3 **A. I assist with a lot of things that they sent me to**  
4 **become an instructor. And when they need me at the**  
5 **academy, they sign me up.**  
6 Q. And you sign in on handwriting sheets like a -- like  
7 literally a roster when you go to those trainings;  
8 right?  
9 **A. Yes.**  
10 Q. When you had the shooting with Parker, when was the last  
11 time you had been to a use of force training?  
12 **A. We have to go to 40-hour block once a -- once a year,**  
13 **and you have to go to the gun range quarterly, and they**  
14 **go through use of force there as well.**  
15 Q. Okay. And the year before the shooting of Parker, do  
16 you remember what would have been covered in that block?  
17 I mean, I know that there's lots covered that  
18 doesn't have to do with use of force. There's legal  
19 updates and other stuff.  
20 With regard to use of force, do you remember  
21 anything that was covered that particular -- within that  
22 year?  
23 **A. No.**  
24 Q. How about the year before?  
25 **A. It's the same thing.**

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1 Q. How about in the five years prior?  
2 **A. As far as what training I went through?**  
3 Q. Specific to the use of force, what particular subjects,  
4 topics they covered.  
5 **A. It's kind of a broad question, ma'am. I mean, within**  
6 **five years I became an active shooter instructor, a**  
7 **handcuff instructor, PR-24 instructor, asp baton**  
8 **instructor. I assist with -- because of my background**  
9 **with the defensive tactics when they need help with**  
10 **that.**  
11 **So, a lot of things I'm certified through the**  
12 **department as an instructor.**  
13 Q. Okay. So, I'm asking about the five years prior to the  
14 shooting what you can talk to me about, about which --  
15 what of those you had in the five years prior to this  
16 shooting?  
17 **A. I couldn't give you them verbatim. I would have to have**  
18 **someone pull it up in MAS.**  
19 Q. Okay. And with regard to the use of force, you  
20 understand that you can't use force unless you report  
21 that the suspect was using force first; right?  
22 **A. Of course.**  
23 Q. Okay. And so, for example, if you shot someone, you  
24 understand that that would be illegal unless there was  
25 some use of force by them first; right?

<p style="text-align: right;">Page 147</p> <p>1 <b>A. Extreme measures, yes.</b></p> <p>2 Q. Okay. And that, in fact, you -- it would have to be</p> <p>3 true that the person was using active aggression, if not</p> <p>4 deadly force, before you would be justified in pulling</p> <p>5 out a gun and shooting them; right?</p> <p>6 <b>A. Yes.</b></p> <p>7 <b>He had a gun. He's charging my partner with a</b></p> <p>8 <b>vehicle. I'm not going to wait for it to happen and</b></p> <p>9 <b>then react. I prevented him from getting shot or ran</b></p> <p>10 <b>over, which I stated several times.</b></p> <p>11 Q. Okay. And so you understood at the night -- on the</p> <p>12 night of the 15th that if -- of course, if you had shot</p> <p>13 a person out on the street without him having a gun or</p> <p>14 driving at your partner, that would be illegal; right?</p> <p>15 <b>A. Of course.</b></p> <p>16 Q. And you could be prosecuted for that; right?</p> <p>17 <b>A. Of course.</b></p> <p>18 Q. And so did you ever talk to Ways or Townson about</p> <p>19 whether they saw a gun that night?</p> <p>20 <b>A. I don't recall.</b></p> <p>21 Q. Do you know why they testified that Parker swerved at</p> <p>22 Ways before the shooting?</p> <p>23 <b>MR. PADDISON:</b> Objection. Calls for speculation.</p> <p>24 <b>A. I don't recall that, ma'am. It happened so quick, like</b></p> <p>25 <b>I said.</b></p>	<p style="text-align: right;">Page 149</p> <p>1 <b>A. No.</b></p> <p>2 Q. Do you know why it would be that you weren't questioned</p> <p>3 in this matter for months after it happened by the --</p> <p>4 you know, by the department?</p> <p>5 You didn't give your Garrity for quite a while.</p> <p>6 <b>A. I have no idea, ma'am.</b></p> <p>7 Q. Did you -- no one ever explained that to you?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Did you get to see Parker's questioning when he comes in</p> <p>10 with his lawyer at any time?</p> <p>11 <b>A. No.</b></p> <p>12 Q. Let's look at the Complaint.</p> <p>13 Yeah, okay. So, if you turn to page 10, paragraph</p> <p>14 51, this is our account of what happened, and I just</p> <p>15 want to understand your take on some of these points.</p> <p>16 So, on page 10, paragraph 51, at the top, says the</p> <p>17 time of this event was shortly after 11:00 p.m.</p> <p>18 Do you know whether -- what the time was?</p> <p>19 <b>A. Uh-uh.</b></p> <p>20 <b>THE REPORTER:</b> I'm sorry. Is that --</p> <p>21 <b>MR. PADDISON:</b> Is that "yes" or "no"?</p> <p>22 <b>A. Oh, I'm sorry.</b></p> <p>23 <b>I would have to look at my report as to what time</b></p> <p>24 <b>approximately.</b></p> <p>25 <b>BY MS. PRESCOTT:</b></p>
<p style="text-align: right;">Page 148</p> <p>1 <b>BY MS. PRESCOTT:</b></p> <p>2 Q. Do you know why Parker and Townson, sitting all the way</p> <p>3 to today, were squared off in the street as of the time</p> <p>4 you pulled up there?</p> <p>5 <b>A. I found out later.</b></p> <p>6 Q. What did you find out?</p> <p>7 <b>A. It was something dealing with the kids and -- his son</b></p> <p>8 <b>and his daughter.</b></p> <p>9 Q. Okay. You talked to Townson about it or what?</p> <p>10 <b>A. I asked him what was going on later. He said his son</b></p> <p>11 <b>called for help and apparently something happened with</b></p> <p>12 <b>his son and his daughter. As far as -- as to what</b></p> <p>13 <b>specifically, I don't know. Like I said, I've only seen</b></p> <p>14 <b>his son a couple of times. I never seen his sister.</b></p> <p>15 Q. Okay. So, you talked to Townson about the situation</p> <p>16 after the fact of how this all unwound?</p> <p>17 <b>A. Yeah. What was going on, what was up.</b></p> <p>18 Q. Okay. And I'll just keep going here.</p> <p>19 You never see Parker flip a U-turn in the street,</p> <p>20 do you?</p> <p>21 <b>A. I don't recall that.</b></p> <p>22 Q. Do you see him stop a bus? You know, step into traffic,</p> <p>23 Parker --</p> <p>24 <b>A. No.</b></p> <p>25 Q. -- cause a bus to have to stop?</p>	<p style="text-align: right;">Page 150</p> <p>1 Q. Okay. We can -- so, whatever your report says is the</p> <p>2 best your remember?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Okay.</p> <p>5 "-- and the street was well-lit and the</p> <p>6 weather conditions were mild."</p> <p>7 Is that true or not true?</p> <p>8 <b>A. This corner was lit, but it was cold.</b></p> <p>9 Q. Okay. There's no fog or sleet or anything. It was</p> <p>10 August; right?</p> <p>11 <b>A. Yeah, it was August, but I remember it was cold.</b></p> <p>12 Q. Okay. Was it clear outside?</p> <p>13 <b>A. It was dark, ma'am, but the corner where we parked, it</b></p> <p>14 <b>was a street light.</b></p> <p>15 Q. Okay.</p> <p>16 <b>A. Down where they were at, it was dark.</b></p> <p>17 Q. What I'm asking is, it wasn't foggy or something?</p> <p>18 <b>A. I don't recall.</b></p> <p>19 Q. Okay.</p> <p>20 "Plaintiff was --"</p> <p>21 so, Parker --</p> <p>22 "-- lightly dressed in shorts, gym shoes</p> <p>23 and a light shirt. No bulky clothing such as</p> <p>24 to conceal a weapon."</p> <p>25 Is that true or not true, or you don't know?</p>

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1 **A. I don't know.**  
2 Q. Don't know. Okay. 53:  
3 "Plaintiff had no weapons."  
4 You dispute that?  
5 **A. I saw him with a weapon.**  
6 Q. The gun you testified about?  
7 **A. Yes.**  
8 Q. And nothing else; right?  
9 **A. And the car.**  
10 Q. But no other weapon; right?  
11 **A. No.**  
12 Q. Okay.  
13 "Townson approached aggressively and began  
14 to question Plaintiff --  
15 Parker --  
16 "-- asking certain questions."  
17 Do you know whether any of that is true on 54?  
18 **A. Like I said, I saw them arguing in the street. I**  
19 **couldn't hear exactly what they were saying.**  
20 Q. Okay. And who approached who or whatever?  
21 **A. I don't know. They were both in the street when I got**  
22 **there.**  
23 Q. Okay.  
24 Parker --  
25 "Plaintiff observed Defendant Townson's

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1 service weapon sticking out of his pocket."  
2 Do you know whether that --  
3 **MR. PADDISON:** Objection. Calls for speculation.  
4 **BY MS. PRESCOTT:**  
5 Q. -- happened?  
6 That's my question.  
7 Do you know if that happened?  
8 **A. I don't know.**  
9 Q. Do you know if Townson had a weapon that night?  
10 **A. I don't know.**  
11 Q. Okay.  
12 "DPD --"  
13 Number 56:  
14 "DPD policies authorize on- and off-duty  
15 police officers to carry their service weapons."  
16 Is that true?  
17 **A. Yes.**  
18 Q. Okay. And, in fact, you can carry concealed; right?  
19 **A. Yes.**  
20 Q. Okay. All right. So, 58, is it common for Detroit  
21 police officers to carry their weapons if they need to  
22 respond to a call or a need for immediate action?  
23 **MR. PADDISON:** Objection. Calls for speculation.  
24 You can answer to the best of your ability.  
25 **A. As far as I know, yes.**

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1 **BY MS. PRESCOTT:**  
2 Q. Okay. And Townson's status as an officer allows him to  
3 have a gun. We -- that's obvious. We know that.  
4 Okay. 60:  
5 "Marcus Ways and Jerald Blanding, also  
6 Detroit police officers, arrived on the scene,  
7 also armed with guns."  
8 So, you know you were and you're not sure about  
9 Ways?  
10 **A. I don't know if his gun was on him, or, like I said, in**  
11 **the car.**  
12 Q. Okay. Does Townson ever hand you a gun that night?  
13 **A. No.**  
14 Q. I mean -- okay. I just want to --  
15 All right. Okay. 62:  
16 "Ways and Blanding reported to the scene  
17 on duty or were third-party interveners in the  
18 dispute --"  
19 **MR. PADDISON:** Can you finish the paragraph,  
20 please?  
21 **BY MS. PRESCOTT:**  
22 Q. (Reading.)  
23 "-- between Plaintiff and his ex-girlfriend  
24 regarding Townson's son."  
25 You didn't know what the dispute was; right?

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1 **A. No. I just know his son called for help.**  
2 Q. And your -- we covered, I think, the rest of that.  
3 You were called to the residence by Townson. You  
4 know that; right?  
5 **A. I wasn't called. Ways was called. I happened to be**  
6 **with Ways.**  
7 Q. Okay. And you get out of the car to help Ways; right?  
8 **A. To help Ways and Townson.**  
9 Q. Okay. And you're unrelated to the ex-girlfriend and  
10 Townson and Townson's son; right?  
11 **A. Correct.**  
12 Q. That's 64. It also says you have no personal interest  
13 in the matter to motivate you as your own personal dog  
14 in this fight or beef; right?  
15 **A. What's the number you're reading?**  
16 Q. 64. You had no personal interest in the matter to  
17 motivate your own intervention?  
18 You didn't have a personal stake in this; right?  
19 **MR. PADDISON:** In what exactly?  
20 **A. I was going to help Townson and see what was wrong with**  
21 **his son with Ways.**  
22 **BY MS. PRESCOTT:**  
23 Q. Okay. The next one says:  
24 Parker --  
25 "Plaintiff asked Townson to put the gun

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1 down."  
2 Were you -- could you hear any of that?  
3 **A. No.**  
4 Q. Okay. So, you don't know one way or another?  
5 **A. No.**  
6 Q. Okay. This -- 66:  
7 "Townson, Ways and Blanding began to close  
8 in on Plaintiff."  
9 Did you ever sort of make a like circle around  
10 Parker?  
11 **A. Never got close to him.**  
12 Q. Okay.  
13 **A. Not down the street.**  
14 Q. Okay. 67 says that he stepped into the bright lights  
15 illuminating Curtis Street and tried to draw attention  
16 to himself.  
17 Did you see that?  
18 **A. No.**  
19 Q. Okay. 68, the next page:  
20 "Plaintiff was able to avoid the closing  
21 officers."  
22 You deny that you were closing in on him; right?  
23 First of all?  
24 **A. No, I wasn't.**  
25 Q. Okay. And he ran to his vehicle?

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1 You know that he certainly got to his vehicle;  
2 right?  
3 **A. Yes.**  
4 Q. And it says it was to the east of the individual guys,  
5 you guys, and it was parked facing west.  
6 Do you know anything about that?  
7 **A. Uh-uh.**  
8 Q. Okay.  
9 **THE REPORTER:** I'm sorry. Is that --  
10 **MR. PADDISON:** Is that a "no"?  
11 **BY MS. PRESCOTT:**  
12 Q. Yeses and nos.  
13 **A. No.**  
14 **I'm sorry.**  
15 **No.**  
16 Q. Okay. It goes on that he entered the vehicle and headed  
17 west on Curtis past you-all.  
18 Did he pass you guys on Curtis?  
19 **A. Not that I recall.**  
20 Q. Okay. And then, 70, he drove several blocks down and  
21 turned around in a parking lot and drove back down  
22 east -- now this time eastbound.  
23 Did that happen?  
24 **A. I don't understand.**  
25 Q. That's 70.

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1 **A. I don't understand how that's written.**  
2 Q. Yeah. So, it takes off with 69. So, 69 says he's  
3 heading west on Curtis past you-all, and then 70, he  
4 drove several blocks and then turned around, going the  
5 other way.  
6 **A. That would be going -- coming southbound --**  
7 Q. Going east?  
8 **A. -- then going eastbound.**  
9 Q. It would be going west, turning around and coming back  
10 east on --  
11 **A. No, I don't remember him driving past me.**  
12 Q. -- on Curtis.  
13 You don't remember that?  
14 **A. I don't remember him driving past me first. I just**  
15 **remember him coming southbound down Mendota.**  
16 Q. Okay.  
17 "As Plaintiff returned down Curtis  
18 eastbound and headed home, Ways stepped into  
19 the middle of the street just before the  
20 intersection of Mendota with his service  
21 weapon drawn."  
22 Is that true?  
23 **A. I didn't see Ways with his weapon out.**  
24 Q. Okay. Did he step into the middle of the street from --  
25 **A. He was in the street.**

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1 Q. Okay.  
2 "Blanding was standing on the north driver's  
3 side of the street."  
4 Which is -- I mean we have "X4" on Exhibit 1.  
5 You were on the north side of Curtis; right?  
6 **A. Yes. 72. Right.**  
7 Q. (Reading.)  
8 "As Plaintiff drove, Defendant Blanding,  
9 and potentially others, deployed deadly force,  
10 firing handgun wildly and repeatedly at  
11 Plaintiff's car."  
12 **A. I wouldn't say "wildly."**  
13 Q. Okay. Other than "wildly," we know you shot at the car;  
14 right?  
15 **A. I shot at him.**  
16 Q. And you hit -- and you hit -- you saw that you were  
17 hitting the car; right?  
18 **A. You don't know that until later, ma'am. I told them I**  
19 **was -- I know I shot at his vehicle down -- down window.**  
20 Q. Okay. So, you're standing 10 feet away from this car?  
21 **A. I said "approximately."**  
22 Q. I understand.  
23 Approximately 10 feet away from this car, you put  
24 16 -- you fire 16 shots, and you don't know whether any  
25 of them hit?

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1 A. I later saw that they hit his car.  
2 Q. Okay. But at the time -- fair enough.  
3 At the time, you didn't know; right?  
4 A. Correct.  
5 Q. And 75:  
6 "The shots were aimed and intended to kill  
7 the Plaintiff."  
8 We already discussed that.  
9 That's true?  
10 A. That's what you're saying. I mean, you don't want to  
11 kill anybody, but I was shooting to protect Ways.  
12 Q. Well, so you didn't intend to kill him?  
13 A. I was shooting to protect Ways.  
14 Q. Okay. Intending to -- if that was what it took, to kill  
15 Demar Parker; right?  
16 A. I don't like how you're wording it like that.  
17 Q. Okay.  
18 "Including one shot directly in the driver's  
19 side window of Plaintiff's car."  
20 Do you recall that?  
21 A. (No verbal response.)  
22 Q. Do you recall it?  
23 A. I recall shooting at his car, but the way you're wording  
24 this to "kill" the Plaintiff, that was never my  
25 intention to do that.

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1 Q. Okay. Well, what -- I guess what I'm asking now is, do  
2 you remember shooting straight into the -- like at chest  
3 level?  
4 A. Into the window?  
5 Q. Yeah.  
6 A. Yes.  
7 See, that's the crap that I'm talking about.  
8 MR. PADDISON: I understand.  
9 A. He didn't do this.  
10 THE REPORTER: Excuse me?  
11 BY MS. PRESCOTT:  
12 Q. What did he not do? Sixty -- was it 76?  
13 A. 77.  
14 Q. (Reading.)  
15 "Once he felt he was safe from Defendants,  
16 Plaintiff pulled over and called for help."  
17 Do you think that didn't happen?  
18 A. Uh-huh.  
19 Q. What --  
20 THE REPORTER: I'm sorry. Is that --  
21 A. That was a no.  
22 I'm sorry.  
23 BY MS. PRESCOTT:  
24 Q. But what do you think happened?  
25 A. One of the witnesses said that he called and was calling

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1 for somebody to come pick him up. That's why they kept  
2 me at the scene so long, to see if he would go to the  
3 hospital. He didn't call 911 or anything.  
4 Q. And what do you draw from the fact that he didn't call  
5 911?  
6 A. He had something to hide. He wanted to go get rid of  
7 that gun first.  
8 Q. Okay. So, why didn't you-all call 911?  
9 A. We did call 911.  
10 Q. Who?  
11 A. Townson called 911 and described the vehicle and what  
12 direction the vehicle went.  
13 Q. He doesn't remember doing that.  
14 A. Townson doesn't remember what? Calling 911?  
15 Q. Right.  
16 A. Okay.  
17 Q. Nor is the tape anywhere that there's any call.  
18 A. Okay.  
19 Q. So --  
20 A. When other units got there, I told them what type of  
21 vehicle it was and what direction it went.  
22 Q. Well, why don't you call 911?  
23 A. Ma'am, it was so much going on. You know, you don't --  
24 I advised them which he went and all that stuff.  
25 They told me later that they found that vehicle

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1 stashed and that he was on the phone with someone saying  
2 that he just got shot. "Come get me. Come get me."  
3 Q. Okay.  
4 A. So, they kept me at the scene to wait to see which  
5 hospital that he possibly went to, which he didn't until  
6 later. And his story, what he came up with, was  
7 something totally different.  
8 Q. What was his story he came up with?  
9 A. I don't know. I don't know. They wouldn't tell me.  
10 Q. Who did you get all this information from?  
11 MR. PADDISON: Objection to the extent it calls for  
12 communication protected under attorney/client privilege.  
13 A. I just know, ma'am.  
14 BY MS. PRESCOTT:  
15 Q. Well, you don't just know. I mean, you had to have  
16 gotten it from somewhere.  
17 MR. PADDISON: Objection to the extent it calls for  
18 information protected under attorney/client privilege.  
19 I'm instructing my client not to answer.  
20 BY MS. PRESCOTT:  
21 Q. I'll take an answer. I mean --  
22 MR. PADDISON: No. I'm instructing him not to  
23 answer about conversations he had with his attorney.  
24 MS. PRESCOTT: I didn't ask for that. I want to  
25 know who he heard it from first.

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1 A. I'll plead the Fifth on that.  
2 MR. PADDISON: No.  
3 BY MS. PRESCOTT:  
4 Q. Well, you can't plead the -- I mean, that's not --  
5 MR. PADDISON: That's not a criminal question. I  
6 am instructing you not to answer.  
7 BY MS. PRESCOTT:  
8 Q. Who in the department do you hear that from?  
9 A. Just other officers.  
10 Q. Which other officers?  
11 A. I don't know their names.  
12 Q. Okay. Well, how many -- like who is on the list of  
13 possibilities?  
14 A. Ma'am, there was a lot of people at that scene.  
15 Q. I know, but not a lot of people know where he went and  
16 what he did and what he called.  
17 So, who is giving you the information on the  
18 investigation?  
19 A. I can't remember who told me when they found his car.  
20 But they said, "We found his car stashed."  
21 Q. They found his car stashed?  
22 A. Uh-huh.  
23 THE REPORTER: I'm sorry. Is that --  
24 A. Stashed.  
25 BY MS. PRESCOTT:

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1 Q. You mean the car that you made undrivable and he drove a  
2 mile away?  
3 A. If that's what you're saying.  
4 Q. Okay. And so you think that there's something wrong  
5 with not calling 911 after the police have just shot  
6 you? You think that that indicates that he was guilty  
7 of something?  
8 A. Why wouldn't you call 911 if someone just shot you?  
9 Q. Well, why wouldn't you call 911 if you just someone and  
10 you're a police officer?  
11 A. Because I had Townson call 911, like I said. When other  
12 supervisors got there, they were receiving information  
13 to go look for him.  
14 Q. You weren't -- you didn't delay calling 911 so that you  
15 guys could create a story?  
16 A. No. They got there real quick, and I didn't have to  
17 make up a story.  
18 Q. How long? How long did it take them?  
19 A. For the police to get there?  
20 Q. Yeah.  
21 A. Under 5 minutes.  
22 Q. Then why don't you call the police when you get there  
23 and you have this --  
24 A. And tell them --  
25 Q. -- belligerent guy in the street and, you know --

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1 A. And tell them what happened, tell them -- you can only  
2 be brief, but tell them what kind of vehicle he was in  
3 and what direction. That was told.  
4 As to which officer --  
5 Q. Right.  
6 A. -- I don't know.  
7 Q. Why don't you guys call 911 the night instead of going  
8 over there with your guns and getting out and walking  
9 out on the street and ultimately ending in a shooting?  
10 A. Apparently, 911 was called prior to us getting there.  
11 Q. So, you knew that too; right?  
12 A. I found that out later.  
13 Q. Okay. You knew -- well, Ways knew that at the  
14 time Blanding -- or -- excuse me -- Townson knew that at  
15 the time.  
16 You learned that later?  
17 A. Yes.  
18 Q. Okay. And so that was one of the reasons why they  
19 needed you to go there because they were worried that  
20 911 wasn't getting there fast enough?  
21 MR. PADDISON: Objection. Calls for speculation.  
22 BY MS. PRESCOTT:  
23 Q. Is that what you understood later --  
24 A. A friend called us and he wanted to see where Ways --  
25 THE REPORTER: I'm sorry?

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1 A. A friend, Townson, wanted to see who was closer to get  
2 to his son because I know Townson stays way out in  
3 Southfield.  
4 (Deposition Exhibit 5 marked  
5 for identification.)  
6 BY MS. PRESCOTT:  
7 Q. Here is Exhibit 5. So, this is Khary Mason.  
8 Are you Facebook friends with him?  
9 A. I don't open Facebook, but he is my friend. I don't  
10 even have Facebook any more.  
11 Q. Okay. Irrespective of that, at some point, did you  
12 become friends with him on Facebook?  
13 A. I have no idea, ma'am. I barely know how to work  
14 Facebook. Someone opened it for me.  
15 (Deposition Exhibit 6 marked  
16 for identification.)  
17 BY MS. PRESCOTT:  
18 Q. Okay. I'll hand you Exhibit 6.  
19 Is this your MAS record?  
20 A. What is that?  
21 MR. PADDISON: MAS.  
22 A. Oh, yeah. This is what I was talking about.  
23 BY MS. PRESCOTT:  
24 Q. Turning to page 8 of 11 -- the pages are at the bottom  
25 left -- what is the "Use of Force PI," that's almost

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1 dead in the middle of the page under "Use of Force  
2 Summary"?  
3 Do you know what that is?  
4 **A. I guess that means the counts of use of force. I don't**  
5 **understand what the "PI" is.**  
6 Q. "Felonious Assault on a Police Officer," two counts, do  
7 you know what that is?  
8 **A. I don't know what they mean by that.**  
9 Q. "Firearm Discharge Reports and Investigation," two, do  
10 you know what that is?  
11 **A. Probably when I killed a dog and shot him. But this**  
12 **isn't up-to-date as far as that.**  
13 Q. "Resisting and Obstructing," two counts, are you  
14 familiar with ever being charged or alleged to have been  
15 involved --  
16 **A. These aren't charges --**  
17 **MR. PADDISON:** No, these aren't charges.  
18 **BY MS. PRESCOTT:**  
19 Q. Okay. I'm asking you whether you've ever been charged  
20 with resisting or obstructing.  
21 **A. No.**  
22 Q. Or assault and battery?  
23 **A. No.**  
24 Q. Anywhere?  
25 **A. No.**

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1 Q. Have you ever been arrested?  
2 **MR. PADDISON:** Objection. Relevance.  
3 You can answer.  
4 **A. No.**  
5 **BY MS. PRESCOTT:**  
6 Q. Okay. "Use of Force History," what is -- looking over  
7 these dates, does this tell -- can you tell me anything  
8 about any of these incidents?  
9 **A. No.**  
10 Q. May of -- like the bottom one on page 8 is May of 2012.  
11 Do you know what that was?  
12 **A. Where?**  
13 Q. So, it's the bottom thing. "Draw Firearm and Acquire  
14 Target Reports," "Use of Force (PI)," 5-23-12.  
15 Do you know what that is?  
16 **A. We pulled over -- if I recall, because it had him -- we**  
17 **pulled over like five guys that just shot somebody's**  
18 **house up. So, of course we're going to acquire target**  
19 **while we get them out of the vehicle. And we got a gun**  
20 **out of there.**  
21 Q. What was the use of force?  
22 **MR. PADDISON:** You can answer.  
23 **A. They're saying pointing your weapon.**  
24 **BY MS. PRESCOTT:**  
25 Q. Well, under that -- after "Acquired Target," under that

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1 is "Use of Force."  
2 **A. I have no idea.**  
3 Q. Okay. The one that's earlier than that is 4-17-12, also  
4 with the same supervisor.  
5 Do you know what this is?  
6 **A. No.**  
7 Q. "Citizen Complaints," page 9 and going on to page 10 and  
8 page 11, looking at the dates of these, I think the  
9 earliest one is 4-16-03, "Force," a male, 39, in  
10 narcotics.  
11 Do you remember a name associated with that?  
12 **A. No, ma'am.**  
13 Q. How about with any of these?  
14 **A. No.**  
15 Q. Were you questioned in each of these instances on pages  
16 9, 10 and 11?  
17 **A. I'm sure I was, but you see the charges that happened on**  
18 **them.**  
19 Q. Well, I just need to know if you remember specific dates  
20 of being questioned.  
21 **A. No, ma'am.**  
22 Q. Do you know whether there were -- what -- you don't know  
23 the circumstances of any of these, it sounds like?  
24 **A. I would have to look back in the archives to see, ma'am.**  
25 Q. And what does "Not Sustained" mean?

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1 Some of them say "Exonerated."  
2 What does "Not Sustained" mean?  
3 **A. I'm assuming it wasn't enough for them to go forward**  
4 **with anything.**  
5 Q. Okay. So, there's a "Force," 4-1-11, against a male,  
6 16-year-old, "Sustained."  
7 What was that?  
8 **A. Where are you looking at?**  
9 Q. It's on page 10, about this far down, 2 or 3 inches  
10 down, 4- --  
11 **MR. PADDISON:** For the record, my ongoing  
12 objection. Foundation.  
13 **BY MS. PRESCOTT:**  
14 Q. -- 1-11 --  
15 **A. I can't recall these things. But it says "Not**  
16 **Sustained."**  
17 Q. Looking at the one that says, "Sustained" against a  
18 male, age 16 --  
19 **MR. PADDISON:** I think it's --  
20 **BY MS. PRESCOTT:**  
21 Q. -- and the female "Sustained" --  
22 **MR. PADDISON:** We're looking at 2010, 10-10-2010?  
23 **MS. PRESCOTT:** Yeah. And it looks like it was  
24 closed out 4-1-11.  
25 **BY MS. PRESCOTT:**

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1 Q. You don't remember what that was?  
2 A. Uh-uh.  
3 MR. PADDISON: Is that a "no"?  
4 A. No, I don't.  
5 I'm sorry.  
6 BY MS. PRESCOTT:  
7 Q. Okay. Next.  
8 Do you know why your discipline file doesn't  
9 contain discipline?  
10 A. Because I'm a good officer. I don't get in trouble.  
11 Q. Well, it doesn't contain the discipline we know you got.  
12 Do you know why that would be?  
13 A. I'm not a supervisor, ma'am. How am I supposed to know  
14 that?  
15 (Deposition Exhibit 7 marked  
16 for identification.)  
17 BY MS. PRESCOTT:  
18 Q. Okay. There's something here relative to mistreatment  
19 of a person or a prisoner, the charge being that you  
20 did, while off duty, mistreat a fellow officer by using  
21 force without cause or justification.  
22 Do you remember that?  
23 A. No. I never had any conflict with another officer. I  
24 don't know what that is.  
25 Q. Hearing officer was Ella Bully-Cummings, 2002.

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1 A. Who?  
2 Q. Ella Bully-Cummings.  
3 A. That was our old chief.  
4 Q. Yeah, I know.  
5 A. Oh.  
6 Q. Does that refresh your memory?  
7 A. That was some allegations that my ex-girlfriend said,  
8 and she found me not guilty on all that, and that  
9 officer ended up getting dismissed from the job. That  
10 was an ex-girlfriend. They threw all that crap out  
11 because she was lying and forced her to retire.  
12 Q. Okay. So, if Exhibit 7 is relating to this -- this  
13 girlfriend was a police officer?  
14 A. Yes.  
15 Q. Okay. So, she made an allegation against you of using  
16 force against her --  
17 A. No. She made allegations --  
18 Q. -- harming her?  
19 A. -- against some property or something, and I did -- if  
20 you did your homework, you'll see plenty of reports that  
21 I did against her. That's why that was thrown out.  
22 That's why she is no longer a police officer.  
23 Q. Okay. So, Exhibit 7 is relating to that -- that person?  
24 A. As I recall. That's the only time -- when you  
25 mentioned -- only reason I said that is because you

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1 mentioned Ella Bully-Cummings. Because as soon as she  
2 heard the story, she threw it out.  
3 Q. Okay. And --  
4 A. As far as me --  
5 Q. What was the name of the officer? The female officer?  
6 A. Tracey Elledge.  
7 She doesn't even stay here any more.  
8 THE REPORTER: Excuse me?  
9 A. She doesn't even live here any more. I don't know  
10 where; don't care.  
11 BY MS. PRESCOTT:  
12 Q. Okay. Have you ever -- has anyone ever sought a PPO  
13 relative to you?  
14 A. I sought a PPO against her.  
15 Q. Did you hear my question?  
16 A. What?  
17 Q. Has anyone ever sought a PPO against you?  
18 A. Not as far as I know.  
19 MS. PRESCOTT: Okay. Why don't we take a break,  
20 and I'll look at my notes.  
21 (Short recess at 4:37 p.m.)  
22 \* \* \*  
23 (Record resumed at 4:50 p.m.)  
24 BY MS. PRESCOTT:  
25 Q. Just a couple of quick odds and ends.

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1 Am I correct in understanding that there -- it has  
2 never come a time when anyone has ever given you any  
3 commentary, criticism, critique on what happened between  
4 you and Demar Parker?  
5 A. No.  
6 Q. Okay. Relative to times when you have been evaluated --  
7 you get certain evaluations at different times.  
8 Have citizen complaints ever been part of the  
9 discussions of your evaluations?  
10 A. Not as far as I know. We get a -- forgot what you call  
11 it -- evaluation every year, but I've always been at the  
12 maximum one for years. I forgot what it's -- service  
13 rating.  
14 Q. Right.  
15 No one has ever said, you know, "Watch out for this  
16 number of citizen complaints," or any kind of references  
17 to --  
18 A. I see a lot of -- we got complaints all the time when we  
19 worked narcotics, ma'am.  
20 Q. But my question remains that no one has raised this  
21 issue with you at your evaluation?  
22 A. No.  
23 Q. Between the night of the shooting and when you leave  
24 that scene and the day of your Garrity interview, do you  
25 know of any steps and investigation that were going on?

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1 I guess you saw Parker at the station, so you at  
2 least know that he was in there.  
3 Anything else you know that went on in that  
4 intervening time?  
5 **A. I saw Parker later, but not that day. I mean, it had to**  
6 **be weeks before I saw him down at Homicide.**  
7 Q. Okay. Anything you know that went on between the night  
8 of the shooting and your Garrity interview to  
9 investigate the situation?  
10 **A. No.**  
11 Q. You don't have any recordings, audio or visual, from  
12 that night, I assume?  
13 **A. No.**  
14 Q. You don't know of anyone who does?  
15 **A. No.**  
16 **I wish I did, but no.**  
17 Q. You don't know of any reason that Parker and Ways would  
18 have any problem with each other; right?  
19 **A. I'm sure after this situation. I mean --**  
20 Q. I apologize. I should make this clear.  
21 Before the incident that we're here about in August  
22 of 2015, you don't know of anything between them; right?  
23 **A. Not -- no.**  
24 **MS. PRESCOTT:** Okay. Okay. Those are my  
25 questions.

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1 **MR. PADDISON:** Okay, Officer Blanding, a couple  
2 real quick follow-ups.  
3 **A. This is yours.**  
4 \* \* \*  
5 **EXAMINATION**  
6 **BY MR. PADDISON:**  
7 Q. First and foremost, do you believe the action you took  
8 in shooting Demar Parker's vehicle saved the life of  
9 Officer Ways?  
10 **MS. PRESCOTT:** Form. It's argumentative.  
11 **A. Yes.**  
12 **MS. PRESCOTT:** And leading.  
13 **BY MR. PADDISON:**  
14 Q. You have been shown what's been marked as Exhibit 3;  
15 correct?  
16 **A. Yes.**  
17 Q. And it's been suggested this purports to be your  
18 Instagram; correct?  
19 **A. Yes.**  
20 Q. Okay. Now, across the top it is the handle "Fatal  
21 Force"; correct?  
22 **A. Yes.**  
23 Q. Okay. The photograph that's displayed in the middle of  
24 that -- of this Instagram page, is that a photograph of  
25 you?

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1 **A. Yes.**  
2 Q. Is that a photograph from your Instagram?  
3 **A. No. That's from Facebook.**  
4 Q. Okay. Do you have any idea why this purported Instagram  
5 page would have a photo from Facebook?  
6 **A. It's -- someone switched that around through Metro Times**  
7 **or whatever. I have no idea why they did it.**  
8 Q. So --  
9 **A. Well, I know why they did it, but they switched the**  
10 **photos around.**  
11 Q. Why do you believe they did it?  
12 **MS. PRESCOTT:** Objection. Speculation.  
13 **A. To make me look bad.**  
14 **BY MR. PADDISON:**  
15 Q. You worked in Narcotics for a period of time; correct?  
16 **A. Half my career.**  
17 Q. Okay. Are you familiar with the slang "ice"?  
18 **A. Yes.**  
19 Q. Okay. What is your understanding of what the term "ice"  
20 means?  
21 **A. Methamphetamine.**  
22 Q. And methamphetamine can be smoked; correct?  
23 **MS. PRESCOTT:** Objection to the form. It's  
24 leading.  
25 **A. Yes.**

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1 **BY MR. PADDISON:**  
2 Q. Can methamphetamine be smoked?  
3 **A. Yes.**  
4 Q. Okay. So, if someone had the handle "Lit Up the Ice,"  
5 would you assume that it was referring to smoking  
6 methamphetamine?  
7 **A. Not necessarily.**  
8 Q. Okay. Is it possible that it's your attorney's handle  
9 that he's had since 16 and refers to hockey?  
10 **A. That would be a good one.**  
11 Q. Okay. Does the handle "Fatal Force" have anything to do  
12 with your employment as a law enforcement officer?  
13 **A. No. That's with my martial arts.**  
14 Q. Okay. Officer Blanding, if an individual has a CPL, can  
15 they carry a concealed weapon?  
16 **A. Yes.**  
17 Q. Okay. Is it illegal to -- for an ordinary citizen to  
18 carry handcuffs?  
19 **MS. PRESCOTT:** Foundation.  
20 **A. No.**  
21 **BY MR. PADDISON:**  
22 Q. Okay. Is it illegal for a citizen with a CPL to carry  
23 an extra magazine for their firearm?  
24 **A. No.**  
25 **MS. PRESCOTT:** Foundation.

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1 **BY MR. PADDISON:**  
2 Q. Officer Blanding, you testified that you were standing  
3 at what appears to be on the northwest corner of Curtis  
4 and --  
5 A. **That's east.**  
6 Q. I'm sorry.  
7 Well --  
8 A. **Okay.**  
9 Q. Okay. The northeast corner of Curtis and Mendota,  
10 correct, at a time -- well, strike that.  
11 You were standing at the corner of -- the northeast  
12 corner of Curtis and Mendota when you heard the car  
13 being driven by Demar Parker approach?  
14 **MS. PRESCOTT:** Leading.  
15 A. **Yes.**  
16 **BY MR. PADDISON:**  
17 Q. And at some point you observed Mr. Parker with a  
18 firearm; correct?  
19 **MS. PRESCOTT:** Leading.  
20 A. **Yes.**  
21 **BY MR. PADDISON:**  
22 Q. When did you observe Mr. Parker with a firearm?  
23 A. **As he was turning.**  
24 Q. Okay. As he was -- as Mr. Parker was turning, were the  
25 headlights from his vehicle still in your face?

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1 A. **Not --**  
2 **MS. PRESCOTT:** Leading and foundation.  
3 A. **-- at that time.**  
4 **THE REPORTER:** I'm sorry?  
5 **BY MR. PADDISON:**  
6 Q. Go ahead and answer.  
7 A. **Not at that time.**  
8 Q. Okay. Were you able to see clearly into the vehicle?  
9 A. **Yes.**  
10 Q. Okay. Did you observe Mr. Parker's vehicle coming  
11 directly at you prior to turning?  
12 **MS. PRESCOTT:** Objection to the form. It's  
13 leading.  
14 A. **I could hear a vehicle coming.**  
15 **BY MR. PADDISON:**  
16 Q. Okay. Could you observe Officer Ways at the time that  
17 Mr. Parker's vehicle was turning?  
18 A. **Yes.**  
19 Q. Okay. When Mr. Parker's vehicle turned, could you  
20 observe Officer Ways within the range of the headlights  
21 of Mr. Parker's vehicle?  
22 **MS. PRESCOTT:** Leading.  
23 A. **Yes. The vehicle was going straight at him.**  
24 **BY MR. PADDISON:**  
25 Q. Okay. So, based on your perceptions, do you believe

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1 that the headlights of Mr. Parker's vehicle were pointed  
2 directly at Officer Ways?  
3 **MS. PRESCOTT:** Same objection.  
4 A. **Yes, they were.**  
5 **MR. PADDISON:** You can place an ongoing, and we can  
6 speed this up.  
7 **BY MR. PADDISON:**  
8 Q. In your experience, is it difficult to see into a  
9 vehicle with headlights pointing directly at you?  
10 **MS. PRESCOTT:** Objection. Form.  
11 A. **Yes.**  
12 **BY MR. PADDISON:**  
13 Q. Okay. So, based on your experience, would it have been  
14 difficult for Officer Ways to see into the vehicle?  
15 A. **Yes.**  
16 Q. It would have been difficult for him to determine  
17 whether or not Officer -- excuse me -- Mr. Parker had a  
18 firearm?  
19 **MS. PRESCOTT:** Objection. Form.  
20 A. **Yes.**  
21 **BY MR. PADDISON:**  
22 Q. So, the drawing has been marked as Exhibit 1; is that  
23 correct?  
24 A. **Yes.**  
25 Q. Okay. Is this drawing to scale?

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1 A. **No.**  
2 **MS. PRESCOTT:** I'll stipulate it's not, yeah.  
3 **BY MR. PADDISON:**  
4 Q. Okay. You've made a number of markings on this drawing;  
5 correct?  
6 A. **Yes.**  
7 Q. Okay. Are those drawings indicative of exact distances?  
8 A. **No, not exact distances.**  
9 Q. Okay. Is it fair to say they're rough approximations?  
10 A. **Yes.**  
11 **MS. PRESCOTT:** Same objection. It's leading.  
12 **BY MR. PADDISON:**  
13 Q. When you were driving with Officer Ways to the location,  
14 you passed near the Northwest Activity Center, did you  
15 not?  
16 **MS. PRESCOTT:** Objection to the form. Leading.  
17 A. **Yes. It's close by where the incident happened at.**  
18 **BY MR. PADDISON:**  
19 Q. Okay. Do you know whether or not at that time Officer  
20 Ways observed Officer Townson's vehicle?  
21 A. **I couldn't -- I didn't know that.**  
22 Q. Okay. Do you know if -- when he says -- when Officer  
23 Ways says that he met Officer Townson at the Northwest  
24 Activity Center whether he meant that he simply observed  
25 Officer Townson's vehicle or whether he stopped and

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1 actually spoke to him?  
2 **MS. PRESCOTT:** Form. It's argumentative.  
3 **A. No, we didn't stop and speak to him, but he could have**  
4 **saw his vehicle. He knew where we were going. I didn't**  
5 **know where we were going.**  
6 **BY MR. PADDISON:**  
7 Q. Would it be unusual to say you met someone at a certain  
8 location if you saw them on the street and followed  
9 them?  
10 **MS. PRESCOTT:** It's argumentative and leading.  
11 **A. Yes.**  
12 **BY MR. PADDISON:**  
13 Q. Okay. So, if Officer Ways saw Officer Townson's  
14 vehicle, would it be unusual to say, "Yeah, I met him at  
15 that location"?  
16 **MS. PRESCOTT:** It's asked and answered.  
17 **A. Yes.**  
18 **BY MR. PADDISON:**  
19 Q. You weren't driving at that time, were you?  
20 **A. No.**  
21 Q. Officer Blanding, when you were initially with Officer  
22 Ways, did you know exactly what was going on at the  
23 Curtis location?  
24 **A. No. I just knew that his son had called Townson and**  
25 **said that he was in trouble and he needed help.**

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1 Q. Okay. Are you aware of a DPD policy governing off-duty  
2 police officers who become aware of criminal activity  
3 that is not in their immediate vicinity?  
4 **A. Explain it one more time.**  
5 Q. I can rephrase that if you need.  
6 **A. Okay. Yes.**  
7 Q. Okay. If you're off duty and you became aware of some  
8 sort of criminal activity that's not in your immediate  
9 vicinity, what is your appropriate course of action per  
10 DPD policies?  
11 **A. To dial 911.**  
12 Q. Okay. Notify on-duty law enforcement?  
13 **A. Yes.**  
14 Q. Okay. Were you acting as a police officer when you and  
15 Officer Ways traveled to the Curtis location?  
16 **MS. PRESCOTT:** Objection to the form.  
17 **A. No.**  
18 **BY MR. PADDISON:**  
19 Q. Okay. Were -- do you believe that Officer Townson was  
20 acting as a police officer when he engaged with  
21 Mr. Parker?  
22 **A. No, I believe --**  
23 **MS. PRESCOTT:** Objection to the --  
24 **A. -- he was --**  
25 **MS. PRESCOTT:** -- foundation.

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1 **A. -- going to help his son.**  
2 **THE REPORTER:** Excuse me?  
3 **MS. PRESCOTT:** Objection to the foundation.  
4 **A. I believe he was going to help his son.**  
5 **BY MR. PADDISON:**  
6 Q. Okay. Did you -- when you observed Officer Ways  
7 approach Mr. Parker and Officer Townson, did you observe  
8 Officer Ways take any police action?  
9 **A. No.**  
10 Q. Officer Blanding, from the time you -- Officer Ways  
11 first got the call, up and until you fired on  
12 Mr. Parker's vehicle, did you take any police action?  
13 **MS. PRESCOTT:** It's been asked and answered.  
14 **A. No.**  
15 **BY MR. PADDISON:**  
16 Q. Okay. Now, is there a DPD policy regarding your  
17 obligations if you fire a weapon on or off duty?  
18 **A. Yes.**  
19 Q. Okay. What is that policy?  
20 **A. Stay at the scene, don't police any brass.**  
21 **THE REPORTER:** "-- don't --" I'm sorry?  
22 **A. Don't police any brass. Don't pick it up. Call for an**  
23 **immediate supervisor to -- call for immediate supervisor**  
24 **and call for union steward. Let them basically call for**  
25 **back-up.**

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1 **BY MR. PADDISON:**  
2 Q. Okay. So, if I'm understanding your testimony  
3 correctly, regardless of whether you are off duty or on  
4 duty, regardless of the circumstances, any time you fire  
5 a weapon, you're required to notify DPD?  
6 **A. With the exception of if you're at the gun range, but,**  
7 **yes.**  
8 Q. Fair enough. Fair clarification.  
9 Is the DPD policy that once you fire a weapon, with  
10 the exception of being at the gun range, you immediately  
11 become a police officer again?  
12 **A. Yes. That's taking police action.**  
13 Q. Okay. You said you observed Mr. Parker run from the  
14 location where he had had altercation with Officer  
15 Townson; correct?  
16 **A. Yes.**  
17 Q. And after you observed Mr. Parker run, you observed  
18 Officer Ways coming back in your direction; correct?  
19 **A. Correct.**  
20 Q. Do you know whether or not Officer Ways was following  
21 anybody?  
22 **A. No.**  
23 Q. Okay. So, you don't know what Officer Ways' state of  
24 mind was at the time?  
25 **MS. PRESCOTT:** Objection. Objection to the form.

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1 A. No.  
2 **BY MR. PADDISON:**  
3 Q. Okay. So, you don't know whether or not Officer Ways  
4 was attempting to follow Mr. Parker?  
5 **MS. PRESCOTT:** Objection to the form.  
6 A. No.  
7 **MR. PADDISON:** Okay. I think that does it.  
8 \* \* \*  
9 RE-EXAMINATION  
10 **BY MS. PRESCOTT:**  
11 Q. Anything you know, sir, about what Townson was thinking  
12 that night, or how he was -- what -- where his head was  
13 would be because Ways told you what Townson had said to  
14 him on the phone?  
15 A. Yes. Because he said his son had called for help, and  
16 he wanted to see where he was at.  
17 Q. Okay. But I'm right that you didn't talk to Townson  
18 that night before the shooting?  
19 A. No. I was listening back and forth to them on the  
20 phone. I couldn't really hear what Townson was saying.  
21 I could hear Ways --  
22 Q. Okay.  
23 A. -- saying where at -- you know, "Where's he at?" and  
24 different stuff like that.  
25 Q. So, you could hear half the conversation?

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1 A. Not even half. Just like, "Where is he at now?"  
2 "Where?" "Okay." You know, stuff like that.  
3 Q. Okay. What policy are you talking about, about what to  
4 do when you've got a shooting, what to do when you have  
5 discharged a weapon? These things you just mentioned,  
6 policies, what policies are those?  
7 A. You have to make your notifications.  
8 Q. Are they written policies?  
9 A. I'm sure they're written. They're just policies per my  
10 experience that I know what you're supposed to do if you  
11 fire your weapon.  
12 Q. Okay. And in terms of what policies are written  
13 relative to deploying force, would you be able to give  
14 me details on any of those?  
15 A. As far as the correct order, not offhand.  
16 Q. When you are at "X4," you hear tires squealing kind of  
17 behind you and over your right shoulder?  
18 A. I can't say what shoulder, ma'am, I just hear tires  
19 squealing and see a car coming at a high rate of speed.  
20 Q. Okay. Well, he's coming from behind you; right?  
21 A. Yes.  
22 Q. Okay. And do you turn to the sound?  
23 A. Yes.  
24 Q. Because you want to see that it's the guy that just ran  
25 off as opposed to some old lady?

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1 A. I'm looking everywhere, ma'am.  
2 Q. Okay. And you lock eyes with the guy or not?  
3 A. No. He never saw me.  
4 Q. Okay. So, he rolls down the window?  
5 A. The window is already down.  
6 Q. Window is down, and he's telling you "What now?" or  
7 "Look what I've got" or whatever?  
8 A. He wasn't telling me. He was saying it as he was  
9 driving toward Ways.  
10 Q. Okay. And so he's saying that while he's turning the  
11 corner or on Mendota or what?  
12 A. As I recall, yes.  
13 Q. Which one was it?  
14 A. As he was turning the corner, that's when I could see he  
15 had a weapon in his hand. He was saying whatever I said  
16 on the PCR, "What's up now, niggers," or something like  
17 that.  
18 Q. Okay. But by then you're already shooting because  
19 you're shooting as he's turning; right?  
20 A. Once I saw the gun and saw him going at Ways, that's  
21 when I started shooting.  
22 Q. You're looking where you're shooting; right? Of course?  
23 A. Of course.  
24 Q. So, when you just testified that you were --  
25 A. Oh, God.

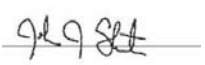
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1 Q. -- looking at Ways, when was that? That was before you  
2 were shooting?  
3 **MR. PADDISON:** Objection. Mischaracterizes the  
4 testimony. The question was could he see Ways.  
5 **BY MS. PRESCOTT:**  
6 Q. Were you ever looking back at where Ways was?  
7 A. I saw where Ways was at. I saw him with the gun in his  
8 hand. I saw him turning the corner hard. I saw him  
9 accelerating towards Ways. That's when I started to  
10 shoot.  
11 Q. Okay. So, you know Ways is off down the way where we  
12 have "X5," and now you turn your attention to the place  
13 you're going to shoot; right? So, you make sure there's  
14 no children, no ladies, no whatever. You're looking  
15 where you're going to shoot; right?  
16 A. Of course.  
17 Q. And as you testified before, that's as he's turning from  
18 south to east, making that turn; right?  
19 A. Yes.  
20 **MS. PRESCOTT:** Okay. That's all the questions.  
21 **MR. PADDISON:** That does it.  
22 Could I get an E-trans and -- I know I say this  
23 every time. Some people are using PTX, others are doing  
24 PDF. We can't open the PTX format, so if I can get an  
25 ordinary PDF, I would very much appreciate that. And

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1 could I get it with an index as well.  
2 (Deposition concluded at 5:06 p.m.)  
3 \* \* \*

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1 STATE OF MICHIGAN )  
2 COUNTY OF OAKLAND )  
3 CERTIFICATE OF NOTARY PUBLIC  
4 I do hereby certify that the witness, whose  
5 attached testimony was taken in the above matter, was  
6 first duly sworn to tell the truth; the testimony  
7 contained herein was reduced to writing in the presence  
8 of the witness by means of stenography; afterwards  
9 transcribed; and is a true and complete transcript of  
10 the testimony given.  
11 I further certify that I am not connected by blood  
12 or marriage with any of the parties; their attorneys or  
13 agents; and that I am not interested, directly or  
14 indirectly, in the matter of controversy.  
15 In witness whereof, I have hereunto set my hand  
16 this day at Highland, Michigan, County of Oakland, State  
17 of Michigan on Friday, October 20, 2017.  
18  
19   
20  
21  
22 John J. Slatin, RPR, CSR-5180  
23 Certified Shorthand Reporter  
24 Notary Public, Oakland County, Michigan  
25 My commission expires: July 25, 2023